

***JOHNSON COUNTY
BOARD OF SUPERVISORS***

**Review & response to the
Environmental Assessment,
prepared by Zambrana Engineering.**

for

THE ARMY CORPS OF ENGINEER'S

**For the proposed lease of 106-acres
by the Muslim Youth Camp of America.**

December 26, 2002

BOARD OF SUPERVISORS

Carol Thompson, Chairperson
Pat Harney
Terrence Neuzil
Sally Stutsman
~~Mike~~ Lehman

December 26, 2002

Karen Hagerty
Planning, Programs, and Project Management Division
Department of the Army
Rock Island District
Corps of Engineers
Clock Tower Building
P.O. Box 2004
Rock Island, IL 61204-2004

Dear Ms. Hagerty:

The Johnson County Board of Supervisors has had extensive discussion regarding the proposed Muslim Youth Camp lease of U.S. Government land on 200th Street NE. We have solicited comments from county staff as well as local communities. Those comments and supporting documents are attached.

22-18 [We strenuously oppose the magnitude of this development in an area with rural infrastructure. Of primary concern is the impact on the county roads. This development would entail considerable cost for road construction and improvements, which is not currently included in the county's five-year road plan.

21-4
33-16 [We have additional concerns for the health and safety of persons who use the proposed development, because the intensity of the proposed use is beyond what our services can provide in the way of fire protection, ambulance service, law enforcement and water rescue. We have no plan in place to increase services to the level this development would need, nor do we have resources to do so. Uses of this magnitude are better served in a city where there are services available and capable of handling it.

163 Furthermore, this proposal does not conform to our land use plan. Over a period of several years, the county has carefully created a plan to manage growth so that it does not exceed infrastructure resources, to protect natural areas, and to avoid conflicting land uses. The proposed camp violates several areas of the land use plan and would almost certainly be denied by us **if** it were presented as a zoning request.

124 We also note that, in several important areas, the environmental assessment prepared by Zambrana deviates factually from standard information, which was provided. **A** notable example is the road traffic counts.

For these reasons, we hope you will carefully consider the attached comments and conclude, as we do, that Alternative One is not appropriate for an area with rural infrastructure. If you do decide to approve Alternative One, we would request that you pay for upgrading the area to urban infrastructure.

Sincerely,



Carol Thompson
Chairperson

JOHNSON COUNTY WORKGROUP RESPONSE: MEMORANDUM TO BOARD OF SUPERVISORS

Review of Environmental Assessment Submitted by **Zambrana Engineering, Inc.**
on behalf of the Muslim Youth Camp of America to the US Army Corps of
Engineers

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MEMORANDUM

To: Johnson County Board of Supervisors

From: Johnson County Staff Workgroup

Re: Review of Environmental Assessment submitted on behalf of proposed Muslim Youth Camp of America, by Zambrana Engineering, Inc. to U.S. Army Corp of Engineers

Date: December 13, 2002

The purpose of this report is to respond to the Environmental Assessment (EA) prepared by Zambrana Engineering, Inc. for the proposed Muslim Youth Camp of America (MYCA). The camp is proposed for the 106-acre site formerly used by the Girl Scouts and known as Camp Daybreak. The camp is accessed via Scales Bend Rd. NE and 200th St. NE.

The Environmental Assessment contains two components; one, the impacts of development on the natural environment; and two, the impacts on area services and infrastructure. Therefore this report will concentrate on possible impacts on the County's ability to provide services to the proposed development as well as to the environmental impacts.

Contributions to this report were made by the staff workgroup, which is comprised of county departments. Each contributing department then submitted comments on the EA based on their area of responsibility. For example, the County Engineer reviewed the impacts on the **secondary** road system; the Fire Chief for impacts for the provision of fire services. The report is essentially a compendium of comments and concerns for the County as submitted by the departments comprising the staff work group.

Issues

There are several issues concerning the applicant's proposal that will significantly impact Johnson County and the services it provides. Besides the incompatibility with existing plans and adopted policies that guide all land use decisions in the County today, a primary concern the County has with the applicant's proposal is the potential for detrimental effects on the existing road network serving this area. Beyond road infrastructure issues, additional burdens will be placed on emergency services including law enforcement (sheriffs Department), fire and ambulance. Environmental impacts as a result of this development also need to be examined more carefully. [The clearing of trees and vegetation has been proposed and will occur if the application proceeds, but it is unclear as to what extent. This may compromise soil stability and lead to soil erosion issues.]

Perhaps the strongest argument against the proposed lease arrangement with the applicant's proposal, is the timing of the proposal. The 1998 Johnson County Land Use Plan and the 1996 North Corridor Plan make up the framework for guiding development where it is most compatible and determines which kinds of uses are preferred in the various areas of the county and at what time that shall occur. Timing development to occur when services and infrastructure are both available is preferred, according to the Land Use Plan, over having development occur first without sufficient infrastructure or services.

History and Background

The proposed site is located approximately 4 miles north of North Liberty, and is accessed from 200th St. NE on the eastside of Scales Bend Road NE. It is a 106-acre parcel adjoining the

Coralville **Reservoir**, being **part** of sections 31 and 32, in township 81 N, range 6 west of the 5th P.M. in Johnson County. The site was initially leased to the Mississippi Valley Girl Scout Council on December 17, 1965. The 25-year lease ran from March 1, 1966 to February 28, 1991. The Girl Scout Camp, known as **Camp Daybreak**, ceased operations in 1990 following a fire.

Camp Daybreak had several buildings that were put up over the course of the lease. A **lodge** that was 40'x40', which had a main assembly room; an open shelter building which was 30'x40' and used for crafts, assembly etc.; 8 tent platforms that could house eight campers per **tent/** per platform; two pit-type outhouses, each with four **stalls**; a 4'x6' storage building; 10-12 parking spaces. The camp was used primarily as a day camp, and had no facilities in place to operate as an extended stay camp.

The EA identifies four alternatives, with Alternative 1 being the most intensive use of the property and Alternative 4 the least intensive. The applicant prefers Alternative 1. It proposes a main Convention Center and lodge that would be approximately 70' X 250'. In addition, there would be 12 tent-pad sites, 10 multi-use cabins, one canoe house, and a caretaker's residence which doubles as a **gate/guard** house. One of the greatest differences between Camp Horizon and the previous camp is that the applicant's facility is intended to be an extended stay camp. The applicant estimates the facility will have 13,500 visitors per year. There is planned to be a total of 66 parking stalls for the camp guests along with a beach and a floating boat dock.

Land Use and Zoning

In 1998 Johnson County took a proactive approach rather than a reactive approach to development in the rural areas. No longer would development be allowed without the provision of services and infrastructure. In order to achieve those purposes, the County created and adopted its 1998 Land Use Plan. The cover page of the Plan says, "The intent of this Land **Use** Plan is to embody our shared goals in a vision for the future; To build community; and To preserve and enhance the quality of life in Johnson County." (**See Attachment A**) In order to achieve these goals, the County must ensure that basic services and infrastructure are available.

According to the Johnson County Zoning Ordinance, Chapter 8:1.1, Purpose: "The purpose of Chapter 8.1 shall be to promote the public health, safety, comfort and general welfare, to conserve the values of property throughout the County, and to lessen or avoid congestion in public streets and highways, and to facilitate the adequate provision of transportation, water, sewage, schools, parks, and other public requirements." (**See Attachment B**)

General development policies also seek to minimize land use conflicts. There are specific policies in the Land Use Plan listed below which seek to reduce conflicts between uses:

Section 3. Minimize Conflict: From 1998 Johnson County Land Use Plan, pages 14 and 15 (See Attachment C)

- 3.1 Recognize existing zoning patterns and minimize disruptions to existing uses.**
- 3.2 Ensure adequate infrastructure and quality public services are available at a level appropriate to the land use.**
- 3.3 Evaluate rezoning proposals to ensure additional development does not occur at a density that requires urban services.**
- 3.4 Applications for rezoning which would make an additional demand on or require enhancement of rural County infrastructure should not be approved unless the developer agrees to bear the cost of improvement.**

With the County's Land Use policies in mind this report will further discuss how the MYCA proposal impacts the County's ability to achieve those goals, and then it will directly address applicable findings in the EA.

Transportation infrastructure

As noted earlier, over the past five years Johnson County has taken a **proactive**, rather than a **reactive** approach to land use planning. In 1996 it adopted an updated North Corridor Plan, and in December of 1998 adopted a new Land Use Plan (The 1998 Johnson County Land Use Plan). These two guiding documents not only identify where and when proposed zoning changes should take place, but also identify **standards** the development must meet, both on and off-site. The major off-site improvements required of developers concern the County's roads.

The Land Use Plan addresses transportation issues throughout the document. (Refer to pages 15 and 22 for **specific policies** and **strategies**) The General Development Policy concerning transportation is summarized below:

Section 4. Transportation: From 1998 Johnson County Land Use Plan, pages 13 and 14 (See Attachment C)

- 4.1 Continue to plan and improve the transportation system.
- 4.2 Ensure traffic safety.
- 4.3 Participate with JCCOG to coordinate Countywide and regional transportation planning.
- 4.4 Utilize land in a manner that will support public transportation where feasible.
- 4.5 Promote multi-modal transportation corridors, which include biking, hiking and all-purpose trails, where appropriate.
- 4.6 Ensure transportation demands can be accommodated when evaluating rezoning requests.
- 4.7 Plan for new roads that are logical and efficient extensions of existing street patterns.
- 3.4 Applications for rezoning which would make an additional demand on or require enhancement of rural County infrastructure should not be approved unless the developer agrees to bear the cost of Improvement.

Additional Strategies of the 1998 Johnson County Land Use Plan concerning transportation are:

Section 4. Transportation: From 1998 Johnson County Land Use Plan, page 22 (See Attachment D)

- 4.1 Create and adopt a Transportation Management Plan.
- 4.2 Develop an ordinance stating that proposed developments on existing County roads must dedicate the necessary rights-of-way for future road improvements.
- 4.3 Request that JCCOG develop with Johnson County and the cities of Johnson County, a master transportation plan that links the County and its cities with the region.
- 4.4 Develop criteria to evaluate proposed development on gravel roads.
- 4.5 Develop criteria and an ordinance for dust alleviation.

As a response to those policies and strategies of the Land Use Plan, the Board of Supervisors adopted The Road Performance Standards for county roads in June of 2000 (**See Attachment E**). They have established thresholds for roads in the county based on surface type (i.e., dirt, gravel, chip-seal surface, and paved surface). The threshold criteria consist of the Average Daily Traffic (ADT) count currently existing on the road and the projected trip generation volume resulting from a proposed development. The County could require the developer to make improvements to the road or **waif** until the County has scheduled the road for upgrading before such a proposed development would be approved.

The County is currently holding work sessions and public hearings for it's Five Year Road Construction Program (**See Attachment F**), and revisions to the adopted policies for development in the North

Corridor. An integral part of both, is the provision of a road improvement plan for roads in the North Corridor. At this point, Scales Bend Road is not prioritized for improvements within the next five years. Improvement of this road would be required in order for Johnson County to consider development proposals on this road. Scales Bend Road is listed on the Future Projects list for the County (See Five Year Road Construction Program), but this is greater than five years out.

The county has made a consistent effort since the 1970s to remove oiled chip seal surfaces from the inventory of the county secondary road system. Oiled chip seal is a dust-free surface, but does not have the structural properties of a paved (asphalt or concrete) surface. Both the County Engineer and the IDOT do not recommend upgrading a gravel surface road to an oiled chip-seal surface as an interim measure prior to paving. In addition to creating significant maintenance problems (especially during the inevitable spring thaw), accident data indicate an associated safety issue when gravel roads are converted to a chip-seal surface without first improving the horizontal and vertical geometry of the road. Merely applying a chip-seal surface to the road without improving its geometry *will increase vehicle speeds and will result in an increased accident rate.*

Responses to the EA Findings (Table 3.6; pg. 75-77)

Transportation ic e

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720
720
dev
priv

With respect to the section *Under Public Facilities and Services (page 17)*, a finding of “No Impact” is presented. The data indicate this is an incorrect assumption. There will certainly be increased traffic On 200th St. and Scales Bend Road. Scales Bend Road already has exceeded the first threshold of 700 Vehicles Per Day (VPD) as identified by the adopted Road Performance Standards. This means that proposals for development may only proceed at a one in twenty acre density, until the Average Daily Traffic (ADT) reaches 1000 VPD, at which point development is prohibited until the road is upgraded. However, because vacant lots that are not built on **(48) (See Attachment G)** must be figured into the ADT count, the count is over 1000 VPD (**48** lots time **8** trips per lot, equals **384**, plus **720**, equals **1104**). Therefore, according to the adopted Road Performance Standards, no further development will be allowed on this parcel until the roads are upgraded, either by the County or a private developer.

Table 1
Platted Vacant Lots

Road Name	Origin	End	Year of Traffic Count	ADT	Number of Additional Lots	Build-Out ADT
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Road Name	Origin	End	Current ADT	Build-Out ADT	Acres Zoned	Total Build-Out ADT
Scales Bend Road	North of N.L.	Jolly Roger	1510	1194	261	2550

12-21-21

Jeff Davidson, Director of Johnson County Council of Governments (JCCOG), and Transportation Planner for the City of Iowa City states; “From the earliest proposal of the MYCA project we have questioned the trip generation that has been outlined for the project by MYCA officials. The proposal entails up to 120 campers plus 16 staff utilizing the facility on a daily basis. Average Daily Traffic based

on information provided by MYCA representatives is stated to be 50 vehicle trips per day during camp operation. This seems low to us. It is possible to argue all day about trip generation rates; there is no way to ascertain with certainty how much traffic a proposed use will generate without establishing the use and measuring the traffic that is generated. However, given that the remote location of the camp will entail every trip to and from the site to be made via motor vehicle, it is not unreasonable to estimate an average daily trip generation of 200-300 trips per day. As an alternative, the traffic analysis provided in the EA also makes use of trip generation statistics published by the Institute of Transportation Engineers. This data is based on such a small sample size that, in our opinion, it is worthless." (See **Attachment H**)

Johnson County Engineer Mike Gardner states in his report that Mr. Craig A. Holan, AICP has concluded in his letter to Zambrana Engineering, "No evaluation of the accident rate has been conducted, but it is extremely unlikely that the small amount of additional traffic associated with the alternatives could materially impact the overall rate."

Mr. Gardner continues: "A cursory review of the Iowa Department of Transportation's (IDOT) Accident Location and Analysis System (ALAS) indicates that there were 29 reported accidents on this segment of roadway from January 1, 1995 through December 31, 2000. Of these 29 accidents, 7 of them involved personal injuries with a total of 6 persons receiving minor injuries and 5 more having major injuries. The costs associated with these injuries are in addition to the \$99,122 worth of property damage estimated on the accident reports filed for these crashes. The accident data presented in the Environmental Assessment is insufficient and lacks the information necessary to arrive at Mr. Holan's conclusion. The issue of Road Performance Standards was touched upon in this report, but basically dismissed as irrelevant. The Road Performance Standards were designed and put into place to limit the amount of additional users that are allowed on a portion of unimproved roadway in Johnson County until an adequate road system is in place to address safety concerns. We feel the concerns, which those standards were based upon, are valid in this situation and need to be considered." (See **Attachment I**)

Providing Emergency Services

Fire Fighting Services

The North Liberty Fire Department provides service in this area. According to Dave Hubler, Fire Chief; the existing well on the property can probably pump a maximum of 30 gallons of water per minute. Chief Hubler feels that a minimum of 2247 gallons per minute necessary to serve Alternative One with fire protection needs, 2247 gallons per minute for four hours. Chief Hubler also has concerns that Scales Bend Rd. is not up to standards and could cause delays in response time, especially in winter driving conditions. He is also worried about being able to access the property using the existing access. The traveled portion is not wide enough and it is overgrown with trees and brush. Chief Hubler has also noted that since this is more than likely a use that will not pay taxes, local taxpayers will have to pay for it. Therefore, he believes that the North Liberty Fire Department should be compensated for providing service to a commercial use. (See **Attachment J**)

Law Enforcement

The Johnson County Sheriffs Department provides law enforcement services to the Corp on a contractual basis. According to Sheriff Carpenter, there is not enough information in the EA for him to estimate the effects on that contract. (See **Attachment K**)

Ambulance Service

Steve Spenler, Director of the Johnson County Ambulance Service, feels that this proposal will not negatively impact his ability to provide ambulance services to the area. (See Attachment L)

Emergency Management Services

Emergency Management is responsible for the planning and coordination of activities in case of a disaster. Tom Hansen, Coordinator of the Department has numerous concerns at this point with the information provided. In particular with the ability of the Fire Department, Law Enforcement and ambulance services to serve the needs of the development. [First is the concern for the roads that access the property. Are they sufficient to handle the increase in traffic?] Next is what will be in place for the storms and tornadoes that are usual in our area? He identifies a need for a Weather Siren, maybe weather radios, and shelters to shelter people during inclement weather incidents.]

These identified concerns may be compounded by the fact that the County does not receive property taxes for land on Corp ground, and if MYCA is a non-profit, tax exempt organization, the County will not receive taxes for the structures. Yet, we must increase the provision of services and infrastructure to meet the demands placed on them by this proposed development. (See Attachment M)

Johnson County Public Health

Ralph Wilmoth, Director of the Johnson County Department of Public Health notes that; "MYCA food service facilities must meet the requirements of the Iowa Food Code. Plans must be submitted to JCPH for review and approval prior to construction, remodel, or use of food service facilities. Johnson County Public Health has been delegated regulatory authority by the Iowa Department of Inspections & Appeals to enforce this code. In the event that the proposed plan changes necessitating the installation or use of private water wells or private onsite wastewater systems, the Johnson County Board of Health regulations governing these facilities would need to be met. If abandoned wells are located on the site, they must be properly plugged in conformance with Johnson County Board of Health Regulation Governing Nonpublic Water Supply Wells 49.15(1)." (Attachment N)

Quality of Life

Under Life, Health, and Safety, (page 17) EA states. "No Impact".

Once again we disagree, there is an impact, and for the County it is a negative one. When development doesn't pay taxes, the services to be provided must be subsidized, either by reducing services, forgoing services elsewhere, or by raising taxes. Health and Safety are directly impacted by increased traffic on 200th St. and Scales Bend Road. The users of the proposed camp also have their safety compromised when it overburdens the County's Emergency Services (Fire, Ambulance, and Sheriff).

Johnson County as with numerous governmental entities in Iowa and across the nation has experienced budgetary constraints the past few years. The County's primary revenue source is the property tax. The County receives no property tax from the U.S. Army Corps of Engineers. It does receive a small payment in lieu of taxes from the Corps every year. According to Jeffrey Horne, the Board of Supervisors Budget Coordinator, "The county has experienced difficult financial times recently due to the drop off in interest rates and the corresponding loss of revenue and an ever expanding use of tax increment financing (TIF) by cities. TIF areas have increased 12% in value over the last year while the overall value of property increased just over 3%. Some of the increase in value in the TIF areas can be attributed to value created by the TIF, but some of it is normal increases in valuation. This

inhibits the ability of the county to meet the service demands caused by growth. The county is near the \$3.50 per \$1,000 of taxable value cap in its general fund and has limited means to create any new revenue streams. A local options sales tax would have to be agreed upon by the cities and county and would then have to be passed by referendum." (Attachment O)

22-20
He goes on to say that the Secondary Roads Department has estimated the cost of improving Scales Bend Rd. NE to Jolly Roger Camp Ground is estimated to be \$1,900,000, and the cost of improving 200th St. NE and the intersection at another \$150,000. Over the previous five years the County has spent approximately \$8,000,000 towards upgrading roads. All improved roads were prioritized during the Five-Year Road Improvement Planning process. Which includes worksessions and public hearings. There are no plans in place at this time for improvements to Scales Bend Rd. NE, or for 200th St. NE, or the intersection of Scales Bend Rd. NE and 200th St. NE.

21-6
There is a significant impact on the County to provide services. If the County cannot provide these services at an adequate level, those using the proposed development and existing users of the services will see a reduction in necessary services. This ultimately has a negative impact on the Life, Health, and Safety of all residents.

Under Land Use, (page 16) EA states, "Consistent with Corp Master Plan".

6-1
It is not clear that this proposal is consistent with the Corps Master Plan. It appears from figure 10 on page 67 (See Attachment P) of the Plan that the area is identified as Recreation/Low Density. Page 65 (See Attachment Q) provides definitions for the different Management Zones. Recreation/Low Density is defined as "Uses such as hiking, trails, primitive camping and ecological workshops are acceptable in this zone." Appendix F (See Attachment R) to the Plan provides an exhibit that appears to show the beach area as a "Protected Lakeshore Area." Finally, there is a Resource Inventory (See Attachment S) dated April 1, 1995, titled: Special Compartment Considerations that discusses the Camp Daybreak Girl Scout Camp. A map in this Resource Inventory identifies the camp with seven numbered parcels, 7, 8, 9, 10, 11, 12, and 15. The Inventory then contains a Land Allocation Category in it that identifies parcels 7, 8, 9, 10, and 11 as LR, and parcels 12, and 15 as RF. It goes on to define LR as Low Density Recreation, and RF as Reserve Forestland. The Plan defines Reserve Forestland as being used "for vegetation control to support certain management objectives. This land will not be used as a source of sustained timber harvest. Such lands will be continuously available for low density recreation activities."

6-21
Even if we have misinterpreted the Master Plan, the Master Plan is not consistent with the County's Land Use Plan, or, the North Corridor Plan. Shouldn't the Corps Master Plan consider the County's Land Use Plan, and the County's ability to provide services to proposed uses on Corp Land? This would indicate that the Corp and the County need to coordinate their planning efforts. This coordinated activity should include the various fire departments, sheriffs office, ambulance service, public schools, and utilities to name a few.

7-6
According to the EA, on page 1 it says the "Corps administrative policy requires that land use decisions should: provide the best possible combination of responses to regional needs, resource capabilities and suitability, and expressed public interests and desires consistent with authorized project purposes." The county fails to see where that is being achieved, especially with regards to resource capabilities of the County.

Environmental Concerns

The Johnson County Land Use Plan speaks very clearly about development for the county as a whole as well as for the North Corridor. In making land use decisions, these general development policies with respect to environmental issues should be followed:

Section 1. Environmental From 1998 Johnson County Land Use Plan, pages 13, 14 (See Attachment 7)

- 1.1 **Protect the environmental quality and natural resources of the County such as woodlands and forested areas by reducing forest fragmentation and destruction of natural habitat for wildlife and plants.**
- 1.2 **Preserve significant features, such as prairie remnants, wetlands, steep slopes as defined by a Sensitive Areas Ordinance, and prime agricultural land. (Please see Johnson County Soils Map, Page 2M)**
- 1.3 **Protect drainage areas, creek beds, and other highly erosive lands.**
- 1.4 **Protect Johnson County water quality.**
- 1.5 **Protect archaeological sites, artifacts, and themes such as burial mounds.**

Under Wastewater Treatment Table 3.5, page 14 (EA).

13-20 The applicant states they will use a leechfield system, which requires Department of Natural Resources approval and a variance. Planning and Zoning staff feels it is not prudent to plan a development presuming a variance will be granted. The variance should be applied for and granted before moving to the building phase.

Under Water Usage Table 3.5, page 14 (EA).

21-9 The applicant states they will use 8,860 gallons per day, and that the current well on the property can generate 20 gallons per minute or 28,000 gallons per day. As was noted by the North Liberty Fire Chief earlier in this report, that is not enough to address concerns over fire fighting service.

Under Soils and Geology, Terrestrial Ecology, Aquatic Ecology, Wetland Resources, Threatened and Endangered Species, Surface Water Resources, Table 3.6, page 15 and Ground Water Resources, and Floodplains Table 3.6, page 16 EA).

30-4 Overall, it appears that the environmental impacts of such an intensive use can be mitigated, and there maybe some benefits accrued from using the property again. According to Harry Graves, Director of the Johnson County Conservation Board, "When these site conditions are taken into consideration along with the fact that this area was the site of a development until recent times the proposed habitat alterations could be an opportunity to actually improve the proposed development area." Mr. Graves goes on to say "The removal of 403 trees, particularly, the oaks, ash, walnut, maple and hackberry trees is, in my mind, a significant loss. However, if mitigation measures requiring the replacement of every tree removed with high quality native hardwood species is included in the design, and if part of the mission of the proposed camp is the teaching of life lessons to young people on the necessity of environmental stewardship, then it seems to me, that the benefits could offset these losses in the long term. A carefully crafted mitigation plan should be an integral part of any development." (See Attachment U)

Still there are concerns about the environmental impacts. Chris Henze, Roadside Vegetation Manager for Johnson County Secondary Roads Department says, "The loss of trees, especially species native to Iowa and species used by the Indiana Bat should be minimized if possible." He goes on to say, "One

11-8 other criteria that is of some concern is the conversion of ~0.1 acres of wetland. While this is a relatively small amount of acreage, many of the forested, temporary wetlands are vital to the survival of many species of herpetofauna. If alternate siting of facilities could protect this wetland, or limit disturbance, it should be encouraged. Mitigation of wetland disturbance elsewhere may be a viable alternative on the lease." [See Attachment V]

Wayne Petersen, Urban Conservationist, for the Natural Resources Conservation Service states in his comments, "While I have not field verified the conditions of the wetland on this site I suspect they are already significantly altered/degraded (the presence of reeds canarygrass as mentioned in the report is a strong Indicator of degraded wetland conditions). I would, however, reconfigure designs to avoid any land disturbing activities to the wetlands, which the report indicated would be possible to do."

11-8 Mr. Peterson continues: "I would also suggest that the wetland areas would benefit from the restoration of an infiltration-based, groundwater-driven hydrology on this site. Increased runoff that would result from traditional development practices would negatively impact wetlands further. Surges of sediment-laden runoff would further degrade them and gully erosion might bisect the upper reaches of wetlands in ravines. The formation or aggravation of gullies would tend to draw down the water tables of ravine wetland systems." (See Attachment

Conclusion

16-3 16-8 The County is concerned that if the proposed lease (Alternative One) is permitted, the planned orderly growth for this area will not have been taken into account. Furthermore, consideration of the 1998 Land Use Plan and the 1996 North Corridor Plan will have been dismissed. If this lease application were a development proposal before the Board of Supervisors at this time, approval certainly would not be granted, given the criteria defined in the Road Performance Standards. The question of the County's ability to provide services and infrastructure is also a primary concern. There are also serious concerns dealing with the environmental impact a development of this scale will bring to the area.

30-5 The majority of the environmental concerns identified, deal with utilizing best management practices during construction, and whether or not "green development, and restoration based land management practices" will be employed during and after the construction phase. On the whole, the comments received stated a belief that if developed with the environment in mind, this proposal may produce positive impacts for the environment.

6-9 One wonders if the suitability of this site is based exclusively on the fact that the past use of this land was also a recreational camp. It must be remembered that the facility proposed by MYCA is very different from Camp Daybreak; Camp Daybreak functioned primarily as a low-intensity day use camp, with significantly fewer buildings, visitors and associated impacts on the surrounding residential area.

33-14 The proposed facility could be located in an area where the impacts to the surrounding land and residents would be less severe. It should be noted that County policy requires that a developer work with the County on resolving the aforementioned issues.

At a minimum it is the County's position that this proposal requires a more in depth study to determine it's overall impacts on the County. If this proposal were to be approved by the Corps of Engineers, the County would hope that the Corps and the applicant would contribute a fair share towards alleviating the identified negative impacts. (Specifically, the roads, and services such as Fire, Law Enforcement, and Ambulance services).

2-7 In closing, this report does not question the designation of this area as a recreational use. It is the timing and magnitude of the proposed use that is in question. As with all development at a more

intensive use comes questions' regarding its impact on present **and** future resources. The primary questions being, "Will the benefits we receive from this development be greater than it's cost, and who will have to shoulder the burden of the cost?" And finally, what impact does this have on the County's ability to manage growth and development? At this time it is the County's position that the answer to the first question is **no**. We believe the cost will be greater than the benefits. The answer to the second question **is** that the taxpayers of Johnson County will have to subsidize the costs.

~~33-32~~ **As** noted earlier, the County's financial resources and revenue generating options are at, or near their maximum. Approving Alternative One at this time will seriously undermine the County's ability to manage its financial resources efficiently, and its land use planning efforts effectively.

If the Corps decides to move forward with Alternative One at this time, the County asks the Corps to pay the costs of improving Scales Bend Rd. NE, 200th St. NE, and the intersection of 200th St. NE, and Scales Bend Rd. NE. The Board also feels the Corps should pay for any new fire fighting equipment for the North Liberty Fire Department necessary to serve the proposed facility.

Work group members include: Mike Gardner, Johnson County Engineer; Ai Miller, Asst. County Engineer; Ralph Wilmoth, Director, Johnson County Health Dept.; Harry Graves, Director, Johnson County Conservation Board; Bob Carpenter, Johnson County Sheriff; Chris Henze, Johnson County Roadside Vegetation Manager; Steve Spenler, Director, Johnson County Ambulance Service; Tom Hansen, Director, Johnson County Emergency Management; Jeff Davidson, Director, Johnson County Council of Governments; Dave Hubler, Fire Chief, North Liberty Fire Dept.; Wayne Peterson, Natural Resources Conservation Service; Andy Chappell, Assistant Johnson County Attorney; Jeffrey Horne, Board of Supervisors Budget Coordinator; and Rick Dvorak, Johnson County Planning and Zoning Administrator.

Report Prepared by:

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ATTACHMENT A

Johnson County Land Use Plan Cover Page

JOHNSON COUNTY LAND USE PLAN



The intent of this Land Use Plan is:

- To embody our shared **goals** in a vision for the future;
- To build community; and
- To preserve and enhance the quality of life in Johnson County.

ATTACHMENT B

Purpose of Chapter 8.1, Johnson County Code of Ordinances

8:1.1. PURPOSE. The purpose of Chapter 8:1 shall be to promote the public health, safety, comfort and general welfare, to conserve the values of property throughout the County, and to lessen or avoid congestion in public streets and highways, and to facilitate the adequate provision of transportation, water, sewage, schools, parks, **and** other public requirements.

8:1.2. NAME. Chapter 8:1 shall be known and may be cited and referred to as the “Zoning Regulations.”

[8:1.3. EXEMPTION OF FARM STRUCTURES .No regulation or ordinance adopted under the provisions of Chapter 8:1 shall be construed to apply to land, farm houses, farm barns, ~~farm~~ outbuildings or other buildings, structures, or erections which are primarily adapted, by reason of nature and area, for use for agricultural purposes, while so used; provided, however, that such regulations or ordinances which relate to any structure, building, dam, obstruction, deposit or excavation in or on the flood plains or any river or stream shall apply thereto.]¹

¹ Resolution 01-03-79-Z4

ATTACHMENT C

Johnson County Land Use Plan: Section 3, Page 14, Minimizing Conflict

and destruction of natural habitat for wildlife and plants. (Please see Land Cover Map, Page 1M)

- 1.2 Preserve significant features, such as prairie remnants, wetlands, steep slopes as defined by a Sensitive Areas Ordinance, and prime agricultural land. (Please see Johnson County Soils Map, Page 2M)
- 1.3 Protect drainage areas, creek beds, and other highly erosive lands.
- I.4 Protect Johnson County water quality.
- 1.5 Protect archaeological sites, artifacts, and themes such as burial mounds.
- 1.6 Preserve and protect historically or architecturally significant resources.

2. AGRICULTURAL

- 2.1 Preserve agricultural land.
- 2.2 Protect farming activities from residential encroachment.
- 2.3 Preserve the availability of agricultural land in Johnson County.
- 2.4 Support the rural lifestyle and the quality of life associated with agriculture presently available in Johnson County.
- 2.5 Discourage non-farm development on prime agricultural land with a Corn Suitability Rating (CSR) of 65 or greater. (Please see Johnson County CSR Map, Page 3M)

3. MINIMIZE CONFLICT

- 3.1 Recognize existing zoning patterns and minimize disruptions to existing uses.
- 3.2 Ensure adequate infrastructure and quality public services are available at a level appropriate to the land use.
- 3.3 Evaluate rezoning proposals to ensure additional development does not occur at a density that requires urban services.
- 3.4 Applications for rezoning which would make an additional demand on or require enhancement of rural County infrastructure should not be approved unless the developer agrees to bear the cost of improvement.

- 3.5 Reduce conflicts between incompatible uses by separating them completely or requiring buffers between uses where separation is not feasible.
- 3.6 Foster greater communication and mutual understanding among all units of government.

4. TRANSPORTATION

- 4.1 Continue to plan and improve the transportation system.
- 4.2 Ensure traffic safety.
- 4.3 Participate with JCCOG to coordinate Countywide and regional transportation planning.
- 4.4 Utilize land in a manner that will support public transportation where feasible.
- 4.5** Promote multi-modal transportation corridors which include biking, hiking and **all-purpose** trails, where appropriate.
- 4.5 Ensure transportation demands can be accommodated when evaluating rezoning requests.
- 4.6 Minimize the impacts of road building on the environment.
- 4.7 Plan for new roads that are logical and efficient extensions of existing street patterns. (Please see Proposed Location for **Oakdale** Boulevard Map, Page 4M and Proposed Location for Iowa Highway 965 Map, Page 5M)

5. RESIDENTIAL

- 5.1 Consider appropriately located residential development where disturbance to natural land features such as steep slopes, floodplain, forest, prairie remnants, wildlife habitat and wetlands is minimal. (Please see Section 1: Environmental Policies and Housing **Units/Area** FEMA Floodplain Map, Page 6M)
- 5.2 Discourage proposals for residential rezoning for non-farm developments in areas essentially agricultural in character. (Please see Section 2: **Agricultural/Rural** Policies)

ATTACHMENT D

Johnson County Land Use Plan: Section 4, Page 22, Transportation

- 3.2 Develop buffering and screening standards for separation of other land **uses** from agricultural, residential, industrial, and commercial uses. These standards should be amended into the County's Zoning Ordinance. (5 and 6)
- 3.3 Contact each municipality within the County to set up Fringe Area Agreements.' (I, **2, 4**, 5, 6, and 7)
- 3.4 Investigate use of Urban Growth Boundaries to reduce conflicts between agriculture and non-agricultural land uses. (I, 2 and 5)

4. Transportation

- 4.1 Create and adopt a Transportation Management Plan.
- 4.2 Develop an ordinance stating that proposed developments on existing County roads must dedicate the necessary rights-of-way for future road improvements.
- 4.3 Request that JCCOG develop with Johnson County and the cities of Johnson County, a master transportation plan that links the County and its cities with the region.
- 4.4 Develop criteria to evaluate proposed development on gravel roads.
- 4.5 Develop criteria and an ordinance for dust alleviation.

5. Residential

- 5.1 Develop and adopt a Conservation Subdivision Design Ordinance implemented through the subdivision review process to promote open space and clustered development.
- 5.2 Develop and adopt County Building codes and building inspections for commercial, industrial, and residential development.

¹ It is the intent that Fringe Area Agreements will lead to cooperative planning for the sound development of the entire County. Johnson County currently has active Fringe Area Agreements with Iowa City and **Tiffin** and **is** currently engaged in the development of agreements with the cities of Swisher, North Liberty, and **Coralville**. It is recommended that **ones** be developed with the Cities of Lone Tree, **Shueyville**, **Solon**, West Branch, Oxford, and Hills.

ATTACHMENT E

12-21-00-Z2: Road Performance Standards Ordinance, December 21, 2000

ORDINANCE 12-21-00-22

**AN ORDINANCE AMENDING THE JOHNSON COUNTY ZONING ORDINANCE
TO ESTABLISH ROAD PERFORMANCE STANDARDS
FOR SUBDIVISIONS**

Section 1. Purpose. The purpose of this ordinance is to further the stated purpose of the Zoning Ordinance for Johnson County by amending Article 8:1.22.V to require that proposed subdivisions shall be approved only if they are in locations which meet certain Road Performance Standards.

Section 11. Amendments. Article 8:1.22.V is hereby amended by adding a sub-paragraph 8:1.22.V. 10 which provides:

10. Road Performance Standards: Proposed subdivisions will be approved only if they are in locations which meet the Road Performance Standards contained in this section.

(A) Dirt Roads.

No subdivision of property will be permitted on dirt roads.

(B) Gravel Roads.

(1) Subdivisions on gravel roads with a projected traffic volume greater than two hundred (200) vehicles per day shall have approval conditioned on a density of development not to exceed one lot for every twenty (20) acres, using a cluster-type subdivision design where at least eighty percent (80%) of the subdivision consists of a non-buildable outlot.

(2) Subdivisions shall not be approved on gravel roads with a projected traffic volume greater than three hundred (300) vehicles per day, unless improvement of said road is scheduled within the next two years of the adopted Johnson County five year road improvement plan.

(3) The preceding vehicle volume thresholds shall be reduced by fifty percent (50%) if (a) the measured 85th percentile speed on the road exceeds the posted speed limit by fifteen (15) miles per hour or more, or (b) horizontal or vertical geometry of said road is judged by the County Engineer to have significant sight distance constraints.

(C) Oiled Chip Seal Roads.

(1) Subdivisions on oiled chip sealed roads with a projected traffic volume greater than seven hundred (700) vehicles per day shall have approval conditioned on a density of development not to exceed one lot for every twenty (20) acres, using a cluster-type subdivision design where at least eighty percent (80%) of the subdivision consists of a non-buildable outlot.

(2) Subdivisions shall not be approved on oiled chip seal roads **with** a projected traffic volume greater than one thousand (1,000) vehicles per day, unless improvement of said road is scheduled within two years of the adopted Johnson County five year road improvement plan.

(3) The preceding vehicle volume thresholds shall be reduced by **fifty** percent (50%) **if** (a) the measured 85th percentile speed on the road exceeds the posted speed **limit** by fifteen (15) miles per hour or more, or (b) **horizontal** or vertical geometry of said road is judged by the County Engineer to have significant sight distance constraints.

(D) Paved Roads.

(1) If turning movements created by a proposed subdivision are judged by the County Engineer to create a potentially hazardous situation, prior to approving a subdivision plat an assessment **shall** be made **by** the County Engineer as to whether or not a road improvement project is necessary to improve traffic safety.

(2) If horizontal or vertical geometry of said road is judged by the County Engineer to have significant sight distance constraints, prior to approving a subdivision plat an assessment shall be made by the County Engineer as to whether or not a road improvement project is necessary to improve traffic safety.

For the purpose of evaluating proposed subdivisions under this section, "existing traffic volumes" shall be determined by the most recent available traffic count recorded by the Johnson County Department of Secondary Roads, the Johnson County Council of Governments, or the Iowa Department of Transportation, in that order of preference; "projected residential traffic volumes" shall be determined by adding to an existing traffic count (i) the number of existing platted lots with direct access multiplied by eight vehicle trips per day, and (ii) the estimated density of development from any currently zoned residential property with direct access multiplied by eight vehicle trips per day; and "projected commercial and industrial traffic volumes" shall be determined by adding to **an** existing traffic volume the estimated trip generation based on the Trip Generation manual published by the Institute of Transportation Engineers.

A proposed subdivision is "on" a particular road if its main entrance intersects that road. For the purposes of applying these standards to proposed subdivisions on gravel roads and oiled chip seal roads, the standards shall apply to the entire road segment between the nearest paved roads. The "entire road segment" may include more than the road where the development project is proposed in order to establish a segment with a paved road at either end.

Section III. Repealer. All other ordinances or parts of ordinances in conflict with the provisions of this ordinance are hereby repealed.

Section IV. Savings Clause. If any section, provision, or part of this ordinance **shall be** adjudged invalid, illegal or unconstitutional, such adjudication shall not affect the validity of the ordinance as a whole or any section, provision or part thereof **not** adjudged invalid, illegal or unconstitutional,

ATTACHMENT F

Johnson County Five Year Road Construction Program: Related Information

JOHNSON COUNTY, IOWA

7

ASSISTANT COUNTY ENGINEER
Alan A. Miller, P.E.

ASSISTANT COUNTY ENGINEER
JlnYeene M. Neumann, P.E.

ASSISTANT COUNTY ENGINEER
Rob Winstead, P.E. & L.S.

JOHNSON COUNTY ENGINEER
Michael R. Gardner, P.E.

MAINTENANCE SUPERINTENDENT
Kevln A. Hackatborn

ASSISTANT MAINTENANCE ***SUPERINTENDENT***
Frank M. Floerchlnger, Jr.

ROADSIDE VEGETATION ***MANAGER***
Chris Henze



JOHNSON COUNTY SECONDARY ROAD DEPARTMENT

4810 MELROSE AVENUE WEST, IOWA CITY IOWA 52246

(319) 356-6046 FAX (319) 339-6133

November 20, 2002

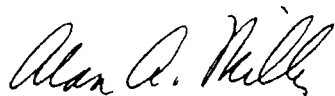
- ✓ Board of Supervisors
- ✓ Planning and Zoning

The following information for the November 26, 2002 5-Year Construction Program Work Session is enclosed:

- e Preliminary Construction Program
- e Preliminary Construction Program Map with Legend
- e FY 2004 Oil Road Data
- e JCCOG Arterial Street Plan
- e Farm to Market Fund Balance Worksheet
- e Federal Bridge Fund Balance Forecast
- STP Fund Balance Forecast
- e Johnson County Bridge Information
- e Recent Traffic Counts for the North Corridor Study Area
- e Intersection Traffic Counts for the North Corridor Study Area

Any questions let me know.

Sincerely,



Alan A. Miller, P.E.
Assistant County Engineer

Iowa Department of Transportation
**SECONDARY ROAD
 CONSTRUCTION PROGRAM**

County Johnson
 Fiscal Year 2004
 Original ☒ Supplemental ☐ No.

COUNTY CERTIFICATION	
The detailed construction program for the Secondary Road System was adopted by the Board of Supervisors on <u>March 13, 2003</u>	
ATTESTED	
County Auditor	Date
County Engineer	Date
Chairperson, Board of Supervisors	Date
IOWA DOT PROGRAM APPROVALS	
Recommended Approval	Date
Approved	Date
Transportation Center	Date
Director of Planning Services	Date

PAVING POINT COMPUTATIONS

Johnson County

Program Year:

2004

Local or FM Route	Project Number	Description / Location	Grade For Pave or Pave	Proposed Program Year	County / Transportation Center Computations	Funct. Class	Current AADT	Closest Paved Parallel Route	Percent Trucks	Bonus Points	Total Points
FM	STP-S-C052(67)--5E-52	Sand Road from 480th St. to Iowa City (26-79.6)	GP/P	2004/05	County Computation	25	40	5	10	0	80
FM	FM-C052()--55-52	Newport Rd. from Sugar Bottom Rd. to Highway #1 (18-80.5)	GP/P	2006	Transportation Center Review County Computation	15	40	5	10	0	70
FM	FM-C052()--55-52	Prairie du Chien Road from Newport to Corps of Engineers Property	GP/P	2007	Transportation Center Review County Computation	15	40	5	10	0	70
FM	FM-C052()--55-52	Newport Rd. from Prairie Du Chien Rd. to Sugar Bottom Rd.	GP/P	2007	Transportation Center Review County Computation	15	40	5	10	0	70
					Transportation Center Review County Computation						
					Transportation Center Review County Computation						
					Transportation Center Review County Computation						
					Transportation Center Review County Computation						
					Transportation Center Review County Computation						
					Transportation Center Review County Computation						

Notes: 1. Bonus points must be accompanied by a letter of documentation

2. Do not list bridge, culvert and 3R projects.

FIVE YEAR SECONDARY ROADS CONSTRUCTION PROGRAM

FOR

Johnson County

Project Number Local ID		Project Name Description of Work Section-Township-Range	AADT Length FHWA #	System Status	\$ Day Labor Type Work SPC/FA Types	Fund	Accomp. Year FY:	[Projected costs in \$1000's] Priority Years				Program Year: FY04
								1st FY:	2nd FY:	3rd FY:	4th FY:	\$ Total Notes:
1	L-ROW-04-73-52 ROW-04	ACCOMPLISHMENT YEAR ROW COSTS	N/A N/A N/A	LOCAL N/A	\$0 311 SPC	LCL FMO SPC	381					\$ 381
2	L-CULV-04-73-52 CULV - 04 CULVERTS ON LOCAL / FM SYSTEM	CULVERTS ON LOCAL / FM SYSTEM NEW AND REPLACEMENT CULVERTS VARIOUS LOCATIONS THROUGHOUT COUNTY	N/A N/A N/A	LOCAL / FM PREV	LOCAL/FM \$100 332 LOCAL/FM	FA LCL FMO SPC	159					\$ 159
3	BROS-C052(53)-8J-52 N-32-1	BRIDGE ON HALF MOON AVENUE BRIDGE AND APPROACH GRADING	70 0.27	LOCAL PREV	\$4 320 LOCAL/FM	LCL FMO SPC	29 48					\$ 77
4	FM-C052(59)-55-52 PHASE 2 RESURFACING	MEHAFFEY/180TH PHASE 2 RESURFACING RESURFACING MEHAFFEY FROM COTTAGE REESERVE TO SOLOM SECTION 28-T81-R06 NE TO SECTION 23-T81-R06	1600 2.1	FM PREV	\$3 366 LOCAL/FM	LCL FMO SPC	3 317					\$ 30
5	STP-S-C052(54)-5E-52 WAPSI AVE. (X14)	SHOULDER WIDEN AND RESURF. ON WAPSI AVE. SHOULDER WIDEN AND RESURFACE SE COR SEC. 21-T77-R05 NO. TO SEC. 16-T77-R05	880-1200 1.7	FM PREV	\$10 352/366/367 LOCAL/FM	LCL FMO SPC	10 166					\$ 360
6	STP-S-C052(67)-5E-52 SAND ROAD	SAND ROAD PCC PAVEMENT GRADE AND NEW GRADE, PAVE AND DRAIN SECTION 02-T78-R06 NORTH TO SECTION 02-T79-R06	1660-2260 2.5	FM PREV	STP \$10 352/367	FA LCL SPC	184 10 200					\$ 1,910

FIVE YEAR SECONDARY ROADS CONSTRUCTION PROGRAM

Form 740491 Sheet 4

FOR

Johnson County

Project Number Local ID	Project Name Description of Work Section-Township-Range	AADT Length FHWA #	System Status	\$ Day Labor Type Work Special Fund	Fund	[Projected costs in \$1000's]				Accomp. Year	Priority Years				Program Year: 2004
						FY:	FY:	FY:	FY:		1st	2nd	3rd	4th	
7 BROS-C052(61)-5F-52 L-O-14-3	BRIDGE REPLACEMENT ON IWW ROAD CULVERT AND APPROACH GRADING SECTION 14-T79-R08	450 204380	FM REV	\$10 332 HBRRP	LCL FMO SPC FA	10 46									\$ 246
8 BROS-C052(62)-5F-52 L-O-15-2	BRIDGE REPLACEMENT ON IWW ROAD BRIDGE AND APPROACH GRADING SECTION 15-T79-R08	450 204390	FM PREV	\$10 320 HBRRP	LCL FMO SPC FA	10 120									\$ 610
9 FM-C052()-55-52 L-S-2-1	BRIDGE REHABILITATION ON SAND ROAD BRIDGE AND APPROACH GRADING SECTION 2-T78-R06	1,660 203130	FM PREV	\$3 320 LOCAL/FM	LCL FMO SPC FA	3 125									\$ 128
2 TX-O	BRIDGE REPLACEMENT ON SAND ROAD CULVERT AND APPROACH GRADING SECTION 2-T78-R06	860 203140	FM REV	\$3 332 LOCAL/FM	LCL FMO SPC FA	158									\$ 158
11 L-ROW-05- / -52 ROW-05	PRIORITY YEAR ROW COSTS	N/A N/A N/A	N/D N/D N/D	\$0 311 LOCAL/FM	LCL FMO SPC FA		350								\$ 350
12 L-CULV-05-73-52 CULV-05 CULVERTS ON LOCAL/FM SYSTEM	CULVERTS ON LOCAL / FM SYSTEM NEW AND REPLACEMENT CULVERTS VARIOUS LOCATIONS THROUGHOUT COUNTY	N/A N/A N/A	LOCAL / FM PREV	\$100 332 LOCAL/FM	LCL FMO SPC FA		100								\$ 100

FIVE YEAR SECONDARY ROADS CONSTRUCTION PROGRAM

FOR

Johnson County

Program Year: 2004

[Projected costs in \$1000's]

Project Number Local ID	Project Name Description of Work Section-Township-Range	AADT Length FHWA #	System Status	\$ Day Labor Type Work Special Fund	Fund	Priority Years				Accomp. Year	FY:	FY:				\$ Total Notes:
						1st	2nd	3rd	4th		2004	2005	2006	2007	2008	
13	L-B-3-52 BRIDGE REPLACEMENT ON HOOSIER CREEK RD SECTION 05-T81-R06	60 205400	LOCAL PREV	\$1 320 LINN CO.	LCL FMO SPC FA		90									\$ 180
14	BROS-CO52(63)-5F-52 L-M-17-1 BRIDGE REPLACEMENT ON IWV ROAD CULVERT AND APPROACH GRADING NW 1/4 SECTION 17-T79-R07	890 204160	FM PREV	\$2 332 HRRP	LCL FMO SPC FA		26									\$ 136
15	LFM-245-SB-7X-52 245TH AND SUGAR BOTTOM INTERSECTION IMPROVEMENTS GRADE AND DRAIN SECTION 10,11-T80-R06	2073 0	N	\$1 352 LOCAL/FM	LCL FMO SPC FA		80									\$ 80
16	BROS-CO52(64)-8J-52 L-N-4-3 BRIDGE REPLACEMENT ON IRELAND AVENUE BRIDGE AND APPROACH GRADING SECTION 4-T79-R07	90 204120	LOCAL PREV	\$2 320 HRRP	LCL FMO SPC FA		32									\$ 160
17	L-ROW-06-73-52 ROW-06 PRIORITY YEAR ROW COSTS	N/A N/A N/A	N/A N/A N/A	\$0 311 LOCAL/FM	LCL FMO SPC FA			350								\$ 350
18	L-CULV-06-73-52 CULV-06 CULVERTS ON LOCAL/FM SYSTEM CULVERTS ON LOCAL / FM SYSTEM NEW AND REPLACEMENT CULVERTS VARIOUS LOCATIONS THROUGHOUT COUNTY	N/A N/A N/A	LOCAL / FM PREV	\$100 332 LOCAL/FM	LCL FMO SPC FA			100								\$ 100

FIVE YEAR SECONDARY ROADS CONSTRUCTION PROGRAM FOR

Johnson County

Project Number Local ID	Project Name Description of Work Section-Township-Range	AADT Length FHWA #	System Status	\$ Day Labor Type Work Special Fund	Fund	[Projected costs in \$1000's]				Accomp. Year	FY:	Priority Years				FY:	\$ Total Notes:
						1st	2nd	3rd	4th			FY:	FY:	FY:	FY:		
19	FM-C0521 J-55-52 NEWPORT ROAD PHASE 1	990 1.2	FM PREV	\$5 352/366/367	LCL FMO SPC					FY: 2004		FY: 2005	FY: 2006	FY: 2007	FY: 2008		\$ 800
				LOCAL/FM	FA												
20	BROS-C052(65)-8J-52 L-D-4-1	70 2057.8	LOCAL PREV	\$1 332	LCL FMO SPC					FY: 2004			20				\$ 100
				HRRRP	FA								80				
21	L-ROW-07-73-52 ROW-07	N/A N/A N/A	N/A N/A N/A	\$0 311 N/A	LCL FMO SPC					FY: 2004				200			\$ 200
				LOCAL/FM	FA												
22	L-CULV-07-73-52 CULV-07	N/A N/A N/A	LOCAL / FM PREV	\$100 332	LCL FMO SPC					FY: 2004				100			\$ 100
				LOCAL/FM	FA												
23	FM-C0521 J-55-52 NEWPORT ROAD PHASE 2	850 2.6	FM PREV	\$5 352/366/367	LCL FMO SPC					FY: 2004					1,700		\$ 1,700
				LOCAL/FM	FA												
24	BROS-C052(60)-5F-52 L-O-25-1	360 204460	FM PREV	\$1 320	LCL FMO SPC					FY: 2004				60			\$ 300
				LOCAL/FM	FA												
				HRRRP	FA									240			

FIVE YEAR SECONDARY ROADS CONSTRUCTION PROGRAM FOR

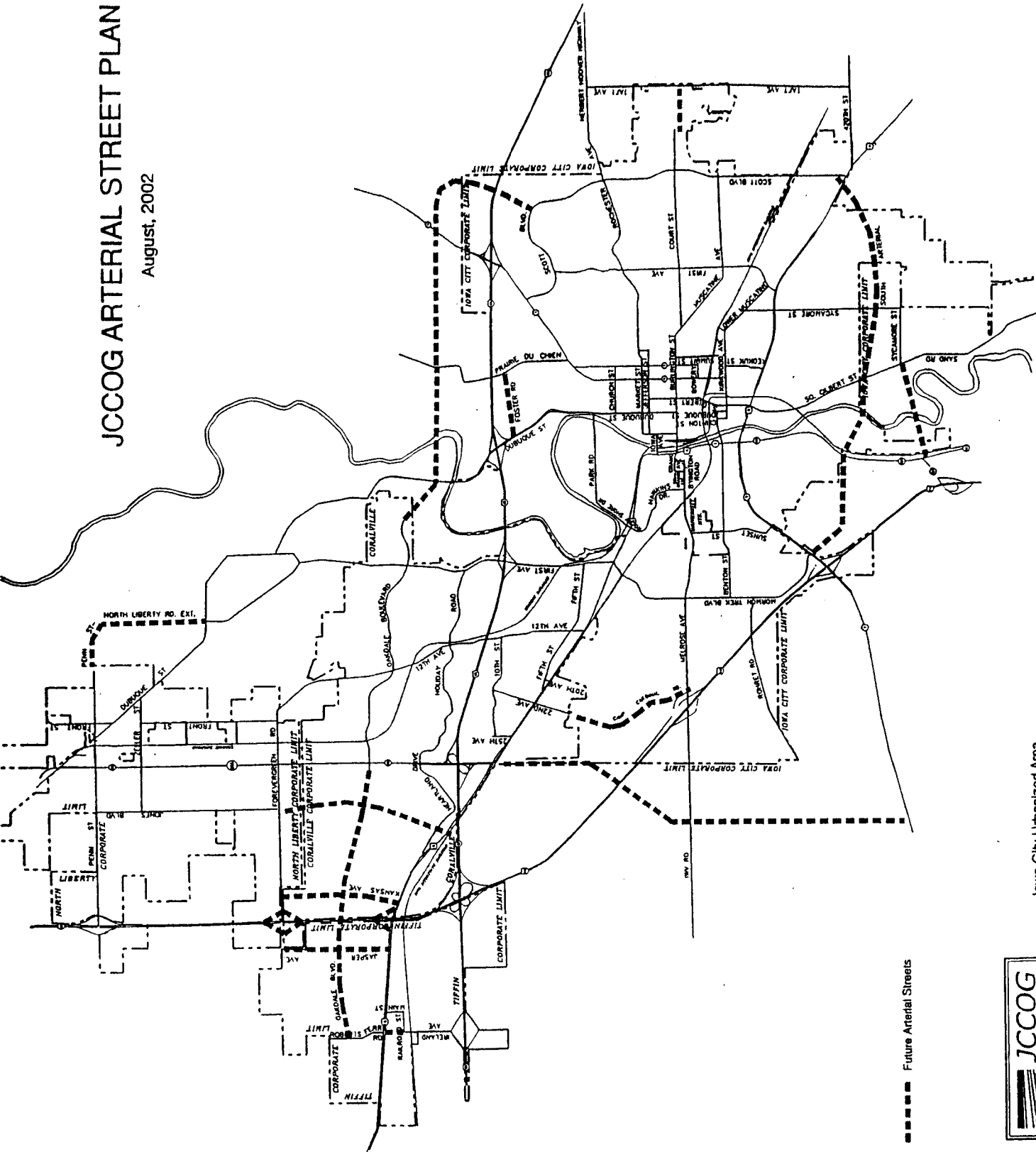
Johnson County

[Projected costs in \$1000's]

Project Number Local ID	Project Name Description of Work Section-Township-Range	AADT Length FHWA #	System Status	\$ Day Labor Type Work Special Fund	Fund	Priority Years				\$ Total Notes:
						Accomp. Year	1st	2nd	3rd	4th
FM-C 62(66)-55-52 O-31- Z	BRIDGE REPLACEMENT ON BLACK DIAMOND RD BRIDGE AND APPROACH GRADING SECTION 31-T79-R08	20	FIM REV	\$2	LCL	FY: 2004	FY: 2005	FY: 2006	FY: 2007	FY: 2008
				320	FMO				400	
					SPC				400	
				LOCAL/FM	FA					
FM-C052()-55-52 PRAIRIE DU CHIEN ROAD	PRAIRIE DU CHIEN ROAD GRADE, DRAIN AND PAVE SECTION 23-T80-R06	90 1	FM REV	\$5	LCL					
				367	FMO				750	
					SPC					
				LOCAL/FM	FA					
					LCL					
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JCCOG ARTERIAL STREET PLAN

August, 2002



Iowa City Urbanized Area
Arterial-Expressway Street System

FY 2004 Construction Program - Oil Road Data

No.	Road Name	Description	Traffic Count		# of Accidents		Crash Rate		Accident Severity		Functional Classification	Classification at Termini
			Length	1998 (ADT)	1996-2000	1996-2000	1996-2000	Major	Minor	PDO		
1	250th St. (F28)	I-380 to Hwy #6	9.2	590	24	242	2	2	3	19	Major Collector	Interstate - Minor Arterial
2	500th St.	Hwy #1 to Sharon Center	2.7	350	2	116	0	0	1	1	Major Collector	Principal Arterial - Minor Collector
3	540th St.	Hwy #1 to Sharon Center Rd.	1.9	690	4	167	1	1	0	3	Minor Collector	Principal Arterial - Minor Collector
4	Angle Rd.	540th St. to 500th St.	3	1080	6	101	0	0	0	5	Minor Collector	Major Collector - Minor Collector
5	Cosgrove Rd.	Cosgrove to Black Diamond Rd.	2.5	380	5	288	1	1	1	3	Minor Collector	Major Collector - Major Collector
6	Ivy/340th/Ireland Ave.	IWW Rd. to I-80	2.9	430	5	220	0	0	0	4	Minor Collector	Major Collector - Interstate
7	James Ave.	Tiffin to 250th St.	2.9	340	8	445	0	0	0	8	Minor Collector	Major Collector - Minor Arterial
8	Lake Manor Rd.	Sandy Beach Rd. South	1.9	660	4	175	0	0	0	4	Local	Minor Collector - Dead End
9	Newport Rd.	Prairie Du Chien to Hwy #1	3.8	900	11	176	0	0	1	10	Minor Collector	Minor Collector - Principal Arterial
10	Prairie Du Chien Rd.	Newport Rd. to COE	1.0	990	0	0	0	0	0	0	Minor Collector	Minor Collector - Local
11	Rapid Creek Rd.	Hwy #1 to Wapsi Ave.	3.3	520	2	64	0	0	1	1	Minor Collector	Principal Arterial - Minor Collector
12	Sand Rd.	520th St. to Hwy #22	4.1	1130	16	189	0	0	4	12	Major Collector	Major Collector - Minor Arterial
13	Sandy Beach Rd.	Shueville to Lake Manor Rd.	1.9	2240	12	154	0	0	3	9	Minor Collector	Major Collector - Local
14	Scales Bend Rd.	End of exist. pav't. North	2.3	1210	8	158	0	0	1	7	Local	Major Collector - Dead End
15	Sharon Center Rd.	Hwy #1 to Sharon Center	5.2	640	23	379	3	3	8	12	Minor Collector	Principal Arterial - Major Collector
16	Sharon Center Rd.	Sharon Center to 540th St.	2.2	380	4	262	1	1	0	3	Minor Collector	Major Collector - Minor Collector
17	Sugar Bottom Rd.	Mehaffey Rd. to Newport Rd.	5.5	530	15	282	0	0	1	14	Minor Collector	Major Collector - Minor Collector

Federal Functional Classification Map for Johnson County
www.msp.dot.state.ia.us/sys_plan/fedfuncclass.html
 Johnson County Average Annual Daily Traffic Map
www.msp.dot.state.ia.us/trans_data/traffic/index.html

State Ave. Crash Rate for 1995 - 1999 = 237

FARM TO MARKET (STATE ROAD USE TAX) FUND BALANCE FORECAST

DATE

FY '03

1ST QTR.

2ND QTR.

3RD QTR.

4TH QTR.

TOTAL

	REVENUE	EXPENDITURE	BALANCE
			\$ 1,133,335
\$	612,013	\$ 379,276	\$ 1,366,072
\$	837,910	\$ 1,369,779	\$ 834,209
\$	291,115	\$ -	\$ 1,125,324
\$	291,115	\$	1,416,439

FY '04

Road Use Tax	\$1,164,462		
STP-S-C052(53)--5E-52			
Wapsi Ave. Shoulder Widen and Resurf.	\$184,000	\$350,000	
FM-C052()--55-52			
Sand Road Grade and Pave	\$0	\$200,000	
Bridge on IWW Rd. 0-15-2	\$440,000	\$550,000	
Bridge on Iww Rd. 0-14-3	\$240,000	\$300,000	
Bridge on Sand Road S-2-1	\$0	\$450,000	
Totals	\$2,028,462	\$1,850,000	\$1,594,901

FY '05

Road Use Tax	\$1,164,462		
STP-S-C052()--5E-52			
Sand Road Grade and Pave	\$1,000,000	\$1,700,000	
Totals	\$2,164,462	\$1,700,000	\$2,059,363

FY '06

Road Use Tax	\$1,164,462		
FM-C052()--55-52			
Newport Road Grade and Pave Phase 1	\$0	\$800,000	
Totals	\$1,164,462	\$800,000	\$2,423,825

FY '07

Road Use Tax	\$1,164,462		
FM-C052()--55-52			
Newport Road Grade and Pave Phase 2	\$0	\$1,700,000	
FM-C052()--55-52			
Prairie du Chien Road Grade and Pave	\$0	\$750,000	
FM-C052()--55-52 (0-31-2)			
Bridge Replacement on Black Diamond	\$0	\$400,000	
Totals	\$1,164,462	\$2,850,000	\$738,287

FY '08

Road Use Tax	\$1,164,462		
TOTAL	\$1,164,462	\$0	\$1,902,749

Federal Bridge Fund (HBRRP) Balance Forecast

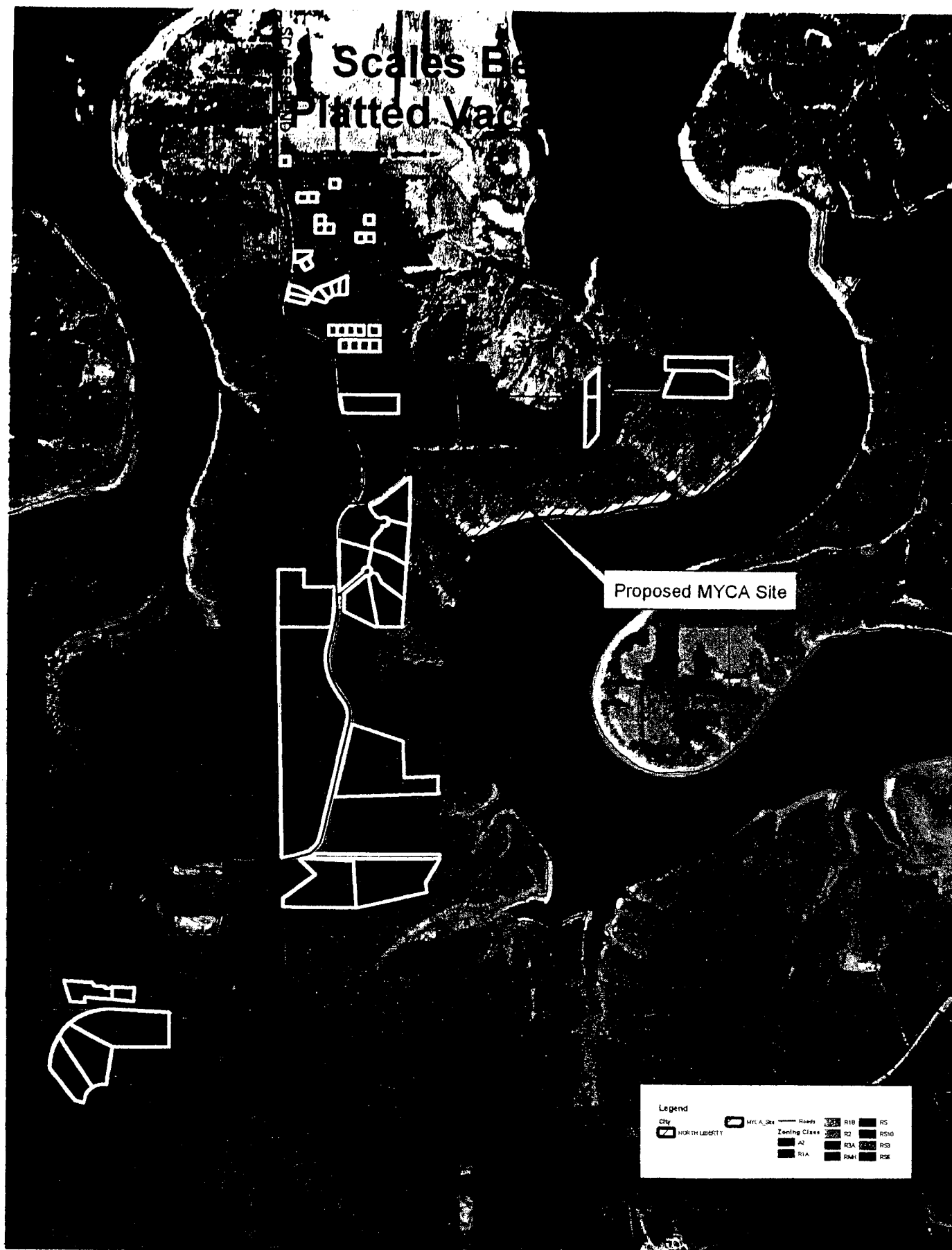
Fed. FY	Project Location	Total Cost	Federal Share	Local Share	Allocation	Balance
	Balance 7-01-02					\$ 353,321.00
2003	Half Moon Ave. (N-32-1)	\$ 300,000.00	\$ 240,000.00	\$ 60,000.00	\$ 228,000.00	\$ 341,321.00
2004	IWV (O-15-2)	\$ 550,000.00	\$ 440,000.00	\$ 110,000.00	\$ 228,000.00	\$ 129,321.00
	IWV (O-14-3)	\$ 300,000.00	\$ 240,000.00	\$ 60,000.00		\$ (110,679.00)
2005	IWV (M-17-1)	\$ 125,000.00	\$ 100,000.00	\$ 25,000.00	\$ 228,000.00	\$ 17,321.00
	Ireland Ave. (N-4-3)	\$ 160,000.00	\$ 128,000.00	\$ 32,000.00		\$ (110,679.00)
2006	Calkins Ave. (D-4-1)	\$ 100,000.00	\$ 80,000.00	\$ 20,000.00	\$ 228,000.00	\$ 37,321.00
2007	Cosgrove Rd. (O-25-1)	\$ 300,000.00	\$ 240,000.00	\$ 60,000.00	\$ 228,000.00	\$ 25,321.00
2008					\$ 228,000.00	\$ 253,321.00

STP FUNDS (FEDERAL STEA FUNDS) BALANCE FORECAST

<u>P A T E</u>		<u>J U E</u>	<u>I D I T L</u>	<u>B A L A N C E</u>
<u>FY '03</u>				
Ending Allocation Balance			\$	142,722
<u>FY '04</u>	Annual Allocation	\$282, 700		
	Totals	\$282, 700	\$0	\$425, 422
<u>FY '05</u>	Road Use Tax	\$282, 700		
	STP-S-C052()--5E-52		\$1,000,000	
	Sand Road Grade and Pave			
	Totals	\$282, 700	\$1,000,000	-\$291,878
<u>FY '06</u>	Road Use Tax	\$282, 700		
	Totals	\$282, 700	\$0	-\$9,178
<u>FY '07</u>	Road Use Tax	\$282, 700		
	Totals	\$282,700	\$0	\$273,522
<u>FY '08</u>	Road Use Tax	\$282, 700		
	Totals	\$282, 700	\$0	\$556,222

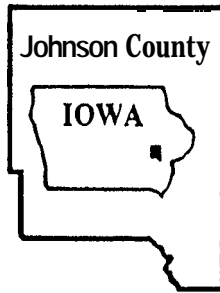
ATTACHMENT G

Road Performance Standards Build-Out Analysis



The yellow outlined parcels are the vacant platted lots (48) that access Scales Bend Road.

0 750 1,500 3,000 4,500 6,000 Feet
1 inch equals 1,503.817235 feet



JOHNSON COUNTY PLANNING AND ZONING DEPARTMENT

RICHARD J. DVORAK
PLANNING & ZONING
ADMINISTRATOR

R J MOORE, AICP
ASSISTANT PLANNING &
ZONING ADMINISTRATOR

DAN SWARTZENDRUBER
ASSISTANT PLANNER

To: Johnson County Board of Supervisors
From: Dan Swartzendruber, Assistant Planner
Date: September 5, 2002
Re: Road Performance Stds. Build-out Analysis

Overview and Methodology

The Board of Supervisors has requested a review of the Road Performance Standards for Subdivisions currently in place. The focus of the review centers primarily on the oiled, chip-sealed roads in the unincorporated areas of the County. Staff has performed a build-out analysis for selected chip-sealed roads in order to forecast the additional amount of traffic that could ultimately impact them. Data for this analysis were obtained from the County Auditor's Office, the Planning and Zoning Department, the Secondary Roads Department and the Iowa Department of Transportation.

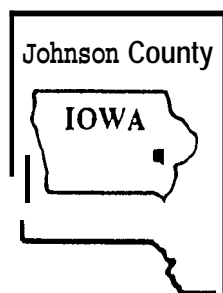
The primary focus of the analysis is to determine the number of currently platted lots that have yet to be developed. Spatial analysis using the County's GIS was used to determine the total number of lots within subdivisions accessing onto specific road segments. Of these total subdivided lots, the buildable lots that had not yet been assigned an address were culled out. These remaining lots could presumably be built on by applying for a building permit.

Given an assumed traffic generation of 8 vehicle trips per day per residence, the additional vacant lots for a particular road segment were calculated and multiplied by the 8 trips per day factor to come up with an "Build-Out ADT" count. The bulk of the baseline counts were derived from the 1998 IDOT Estimated Traffic Counts. In addition, a few of the roads studied had more recent counts performed by the County. It is important to note that this analysis will not capture those **vacant** lots that were partitioned prior to zoning and subdivision regulations. Refer to Table 1 *Vacant Platted Lots* for the estimated build-out Average Daily Trip totals.

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JOHNSON COUNTY PLANNING AND ZONING DEPARTMENT

RICHARD J. DVORAK
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ADMINISTRATOR

R J MOORE, AICP
ASSISTANT PLANNING &
ZONING ADMINISTRATOR

DAN SWARTZENDRUBER
ASSISTANT PLANNER

Table 1

Platted Vacant Lots

Road Name	Origin	End	Year of Traffic Count	ADT	Number of Additional Lots	Build-Out ADT
Dane Road	Highway 1	465 th St.	1998	340	33	604
Stewart Road	Dubuque St.	River	1998	1000	18	1144
Scales Bend Road	North of N.L.	Jolly Roger	1998	1510	48	1894
Linder Road	Dubuque St.	Prairie Du Chien	1998	920	17	1056
Sharon Center Road	500 th St.	Old Man's Creek	2000	482	2	498
Sharon Center Road	Old Man's Creek	Highway 1	2000	608	0	608
Rapid Creek Road	Highway 1	LynDen Hgt. Rd.	1995	997	1	1005
Rapid Creek Road	LynDen Hgt. Rd.	Dingleberry Rd.	1998	550	2	566
Newport Road	Prairie Du Chien	Turkey Creek Rd.	2002	741	9	813
Newport Road	Sugar Bottom Rd.	Quincy Rd.	2002	986	4	1018
Newport Road	Quincy Rd.	Highway 1	2002	1186	3	1210
Sugar Bottom Road	Jordan Creek Rd.	Mehaffey Bridge Rd.	2002	352	17	488
Sugar Bottom Road	Anchorage Rd.	Jordan Creek Rd.	2002	569	2	585
Sugar Bottom Road	Newport Rd.	Anchorage Rd.	2002	776	14	888
Sandy Beach Road	Lake Manor Rd.	East to end of oil	1998	520	7	576
Sandy Beach Road	Roberts Ferry Rd.	Lake Manor Rd.	1999	1351	13	1455
Sandy Beach Road	Roberts Ferry Rd.	Mohawk Rd.	1998	1360	2	1376
Sandy Beach Road	Curtis Bridge Rd.	Mohawk Rd.	1999	2419	5	2459
Lake Manor Road	Sandy Beach Rd.	End	1999	1282	42	1610
Prairie Du Chien Rd.	Newport Rd.	End	2002	645	14	757
12 th Avenue Extension ¹	Oakdale Rd.	Front St.	1999	1558	0	1558
Cottage Reserve Rd.	Mehaffey Bridge Rd.	End	2000	832	5	872

Another means of defining the build-out potential for a given area and the resultant impact on a particular road segment is by determining the amount of previously zoned ground that has not yet been platted. This type of analysis is somewhat more subjective in that the ability to determine the actual number of lots which could be developed is a function of density, topography, design and wastewater considerations, just to name a few.

In order to provide an adequate assessment of the number of additional lots which could be developed in a given area, the overall density of the development is determined using a 1, 3 or 5-acre minimum lot size dependent on County Health Department requirements. After this initial density is determined, another 5% of the total area is subtracted to account for the interior

¹ Only a small portion of this area is now within the County. The remainder is within the cities of Coralville or North Liberty. Coralville pre-addresses all of their subdivisions, so additional data is necessary in order to make an accurate forecast.

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RICHARD J. DVORAK
PLANNING & ZONING
ADMINISTRATOR

R J MOORE, AICP
ASSISTANT PLANNING &
ZONING ADMINISTRATOR

DAN SWARTZENDRUBER
ASSISTANT PLANNER

subdivision infrastructure. This typically reflects a more accurate number of lots, which could potentially be developed in these areas. Another issue that influences the build-out of previously zoned ground is the recently adopted Clustered Subdivision Design ordinance which allows for density bonuses based on the amount of conservation land set aside within the subdivision.

Finally, not all of the GIS information for the Zoning layer has been completed and sufficiently determined to be accurate, therefore, not **all** of the roads will have projections for zoned ground in addition to the additional platted lots. Table 2 examines the total build on a select number of **roads** in the County, given currently platted and zoned ground.

Table 2

Zoning Build-Out for Selected Roads

Road Name	Origin	End	Current ADT	Build-Out ADT ²	Acres Zoned	Total Build-Out ADT
Dane Road	Highway 1	465 th St.	340	604	191	2052 ³
Stewart Road	Dubuque St.	River	1000	1144	42	1464
Scales Bend Road	North of N.L.	Jolly Roger	1510	1894	261	2550
Linder Road	Dubuque St.	Prairie Du Chien	920	1056	29	1272
Sharon Center Road	500 th St.	Old Man's Creek	482	498	N/A	498
Sharon Center Road	N of Old Man's Creek	End	608	608	32 ⁴	1108 ⁵
Rapid Creek Road	Highway 1	LynDen Hgt. Rd.	997	1005	37	1285
Newport Road	Prairie Du Chien	Turkey Creek Rd.	741	813	64	1301
Sugar Bottom Road	Jordan Creek Rd.	Mehaffey Bridge Rd.	352	488	333	3016
Sugar Bottom Road	Newport Rd.	Anchorage Rd.	776	888	80	1496
Sandy Beach Road	Lake Manor Road	East to End of Oil	520	576	84	789
Sandy Beach Road	Roberts Ferry Road	Lake Manor Road	1351	1455	53	1485
Sandy Beach Road	Roberts Ferry Road	Mohawk Road	1360	1376	N/A	1376
Sandy Beach Road	Curtis Bridge Road	Mohawk Road	2419	2459	N/A	2459
Lake Manor Road	Sandy Beach Road	End	1282	1610	35	1699
Prairie Du Chien Rd.	Newport Rd.	End	645	757	107	1557
12 th Avenue Extension	Oakdale Rd.	Front St.	1558	1558	N/A	N/A ⁶

² Build-Out ADT includes those platted, undeveloped lots as defined in Table 1.

³ Calculation is: 191 acres of zoned ground; subtract 5% for infrastructure; 181.45 acres @ 1 ac. **Minimum** density requirement. 181 additional lots multiplied by 8 trips per day equals 1448 additional trips, added to the platted build-out analysis of 604 trips equals **2,052 trips** per day.

⁴ There are 32 acres zoned CH Commercial Highway.

⁵ **This** is making a rather conservative assumption that a business on the 34 acres would generate fewer than 500 Trips per day.

⁶ The cities of Coralville and North Liberty are growing together here, difficult to determine ADT for this segment.

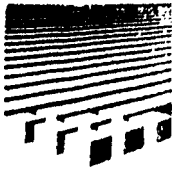
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ATTACHMENT H

Memo from Johnson County Council of Governments
Re: Environment Assessment



Johnson County Council of Governments

410 E Washington St Iowa City Iowa 52240

December 4, 2002

Rick Dvorak, Administrator
Johnson County Planning and Zoning Department
913 S. Dubuque Street, Suite 204
Iowa City, IA 52240

Re: Your request for comments on the Environmental Assessment of the proposed lease at Coralville Lake, Johnson County, Iowa; Muslim Youth Camps of America (MYCA) proposal

Dear Rick:

At your request the JCCOG Transportation Planning Division has reviewed the Environmental Assessment prepared for the **106-acre** site north of North Liberty on Coralville Lake, which was formerly used for the Mississippi Valley Girl Scout Council. The Environmental Assessment proposes a Finding of No Significant Impact (FONSI) for the proposed MYCA project. You have asked for our comments in conjunction with the committee formed by the Board of Supervisors to review the EA. Incidentally, the EA was sent to us directly by the **U.S. Army** Corps of Engineers for comments prior to your contacting me.

I would like to clarify that the comments provided in the following correspondence relate only to the transportation impacts of the proposal. This has been a controversial issue, and our comments should not be construed as positive or negative commentary on the merits of the MYCA proposal.

22-21
From the earliest proposal of the MYCA project we have questioned the trip generation that has been outlined for the project by MYCA officials. The proposal entails up to 120 campers plus 16 staff utilizing the facility on a daily basis. Average Daily Traffic based on information provided by MYCA representatives is stated to be 50 vehicle trips per day during camp operation. This seems low to us. It is possible to argue all day about trip generation rates; there is no way to ascertain with certainty how much traffic a proposed use will generate without establishing the use and measuring the traffic that is generated. However, given that the remote location of the camp will entail every trip to and from the site to be made via motor vehicle, it is not unreasonable to estimate an average daily trip generation of 200-300 trips per day. As an alternative, the traffic analysis provided in the EA also makes use of trip generation statistics published by the Institute of Transportation Engineers. This data is based on such a small sample size that, in our opinion, it is worthless.

The focus of the traffic analysis included in the EA is on road capacity. There are some errors in the traffic information which is presented, such as the statement that Level of Service is a measurement of road capacity. Level of Service is actually a measurement of delay; capacity is expressed as volume/capacity ratio and is typically expressed at a particular delay level, or Level of Service. Regardless, the basic conclusion of the traffic analysis is that there will be no significant impact to either 200th Street NE or Scales Bend Road with respect to road capacity.

22-21
We concur with this conclusion, and would add that using the higher trip generation numbers of 200-300 trips per day would lead one to the same conclusion. This should not surprise anyone; nearly all county secondary roads are of relatively low traffic volume, and adequate when it comes to a strict analysis of road capacity.

What the traffic analysis in the EA fails to understand is that road capacity is not the issue for the County. The issue for the County, as expressed quite specifically in the adopted road performance standards, is when should Scales Bend Road be upgraded and improved. This notion is expressed clearly in the summary report from the Johnson County Planning and Zoning Department that is included in the EA. However, it does not appear to be understood by the EA consultant.

16-8
It is disturbing the arrogance with which the EA traffic consultant dispenses with the legitimacy of the County's adopted road performance standards. The traffic consultant attempts to negate the legitimacy of the road performance standards by citing the *AASHTO Policy on Geometric Design of Highways and Streets*. If the question of when an unpaved road surface should be paved was something that could simply be measured by referring to a geometric design manual, we could have dispensed with the two-year process we used to develop the roadway performance standards, as well as the subsequent controversy which they have generated.

The County's road performance standards as they pertain to the adequacy of road geometry and surface type are a subjective matter. We attempted in our research to bring as much objectivity to them as possible; but ultimately, when an unpaved road should be upgraded is a subjective matter to be determined by the elected officials of Johnson County. As outlined clearly in your report which is contained in the EA, the existing traffic volumes on Scales Bend Road exceed the traffic threshold established for a chip sealed road by 50%. If projected traffic volume with existing platted and zoned properties is included, at build-out the Scales Bend Road traffic volume would exceed the threshold by 200%.

22-24
The issue with the adequacy of Scales Bend Road exists incidental of the MYCA proposal; any redevelopment of this property that increases traffic volume will exacerbate the road surface adequacy issue on Scales Bend Road. The Board of Supervisors has shown great foresight in adopting the road performance standards, and for this they should be congratulated, not condemned. These standards, although not without controversy, are an important step in preserving the safety and quality of life for county residents in unincorporated Johnson County..

Let me know if you would like JCCOG Transportation Planning Division staff to attend a meeting of your County committee on this issue, or if there are any questions.

Sincerely,



Jeff Davidson
Transportation Planner

ATTACHMENT I

Memo from Johnson County Engineer, Re: Environmental Assessment

ASSISTANT COUNTY ENGINEER
Alan A. Miller, P.E.

ASSISTANT COUNTY ENGINEER
JlnYeene M. Neumann, P.E.

ASSISTANT COUNTY ENGINEER
Rob Winstead, P.E. & L.S.

JOHNSON COUNTY ENGINEER
Michael R. Cardner, P.E.

MAINTENANCE SUPERINTENDENT
Kevin A. Hackathorn

ASSISTANT MAINTENANCE SUPERINTENDENT
Frank M. Floerchlenger, Jr.

ROADSIDE *VEGETATION* MANAGER
Chris Henze



JOHNSON COUNTY SECONDARY ROAD DEPARTMENT

4810 MELROSE AVENUE WEST, IOWA CITY IOWA 52246

(319) 356-6046 FAX (319) 339-6133

December 6, 2002

T : Planning & Zoning Department

From: Michael R. Gardner, P.E.
Johnson County Engineer
Alan A. Miller, P.E.
Assistant Johnson County Engineer

RE: Environmental Assessment of Proposed Lease at Coralville Lake

We have been asked to review the above referenced document and give our comments/concerns regarding the contents related to our area of responsibility. The focus of our comments will be traffic related and the impact it has on the existing infrastructure and safety of the traveling public.

Safety issues remain the primary concern that need to be addressed in evaluating this proposal. The traffic analysis provided in this report is misguided, at best. The Level of Service Analysis is a valid analysis, but gives very little useful information to evaluate the traffic impacts on Scales Bend Road, 200th Street, and the intersection of the two roads. Congestion of the roadway is not a concern that has ever been raised by this department. With the exception of the intersection analysis of Scales Bend Road and 200th Street, there is no doubt that the roads in question can handle the traffic volumes discussed in the report without the users experiencing a high degree of congestion. Congestion or lack of it is not useful in the analysis of safety concerns and crash rates in this case, and to conclude that there is no impact due to the traffic generated by the MYCA lease or any other additional development on these road segments is flawed. It is not unusual to have a high crash rate on a two-lane road that is providing level of service C or higher.

The traffic generation analysis included in the Environmental Assessment provides an estimate for the special events and summer camp sessions. The area of special concern is the traffic generated by special events. It is stated in the report that certain special events at the site, such as weddings or meetings, could produce traffic volumes in excess of 100 vpd (50 round trips per day) at times throughout the year. The language in the sample standard real estate lease agreement provided in Appendix D of the Environmental Assessment does not address the size of these events nor the number of events that would be allowed to occur. This makes it difficult to determine the impact

22-19

these events would have on Scales Bend Road, 200th Street and the intersection of these two roads.

The **MYCA** lease alternative would substantially change the traffic characteristics of this rural local road from one that is predominantly serving local users, familiar with its curvature and other geometric features, to one which adds drivers who are unaware and unaccustomed to the driving conditions that currently exist. Adding bus traffic to the mix further complicates the situation. These changes create the potential to increase the accident rate on this section of road.

Mr. Craig A. Holan, AICP has concluded in his letter to Zambrana Engineering, "No evaluation of the accident rate has been conducted, but it is extremely unlikely that the small amount of additional traffic associated with the alternatives could materially impact the overall rate." A cursory review of the Iowa Department of Transportation's (IDOT) Accident Location and Analysis System (ALAS) indicates that there were 29 reported accidents on this segment of roadway from January 1, 1995 through December 31, 2000. Of these 29 accidents, 7 of them involved personal injuries with a total of 6 persons receiving minor injuries and 5 more having major injuries. The costs associated with these injuries are in addition to the \$99,122 worth of property damage estimated on the accident reports filed for these crashes. The accident data presented in the Environmental Assessment is insufficient and lacks the information necessary to arrive at Mr. Holan's conclusion.

16-8 The issue of Road Performance Standards was touched upon in this report, but basically dismissed as irrelevant. The Road Performance Standards were designed and put into place to limit the amount of additional users that are allowed on a portion of unimproved roadway in Johnson County until an adequate road system is in place to address safety concerns. We feel the concerns, which those standards were based upon, are valid in this situation and need to be considered.

ATTACHMENT J

Memo from North Liberty Fire Department, Re: Environmental Assessment

NORTH LIBERTY FIRE DEPARTMENT

FIRE/RESCUE/HAZMAT
25 West Cherry Street
North Liberty, Iowa 52317

Chief David A. Hubler

Phone: (319) 626-5717

Fax: (319) 626-3288

E-Mail: dhubler@cl.north-liberty.ia.us

TO: RJMOORE
BRIAN JAMES
SARAH HELT

SUBJECT: MYCA PROJECT

Penn Township Trustee Sarah Helt, first contacted me on Wednesday November 20, 2002 in the evening, asking about the article in the Iowa City Gazette. She wanted to know my feeling on this camp. She had talked with past Fire Chief Brian Greer in 1999 or 2000 when this issue first came up. We discussed the article. I pointed out some of my feeling to her at that time.

On Friday November 22, 2002 I had a short discussion with City Administrator Brain James about MYCA. After I was able to get the rest of my work done at the fire station. I went to the location of campsite off Scales Bend road to 200 St. I have never been on this property before, and wanted to check out distances. From the North Liberty Fire Station it is approximately 3.6 miles to the gate of the campgrounds. I parked my pickup outside of the gate, walked down the old roadbed to check the grounds out. The old walk bridges to the cabins the cabins are still there. The old cabins have the poles and floors are still there. The sidewalls and roof have collapsed onto the floor. There is a lot of under growth of vegetation through out. I was able to see the orange tape that marks the different locations and a blue tape. I found the old toilet and shower area and went over to the existing picnic shelter. The existing well is a 6" well casing which can probably pump a maximum of 30 gallons a minute. From the old lodge foundation I walked back to the southeast where the planned parking lot is to be located. I then returned back up the roadbed, which has undergrowth and a tree canopy. From here I drove down Cumberland Ridge Road, which runs parallel with the camp lane. It is approximately .3 miles from the gate to where the convention center will be located. From the gate to the Jolly Roger camp ground boat ramp is approximately 1.8 miles, this is one location where a pumper could be set in order to draft out of the lake for water to shuttle. The number of campers and boaters can affect this at the time. There is also a steep grade as you come out of the camp grounds on scales bend road to return to the proposed site and you will be coming through residential areas. From the gate, back to North Liberty's nearest hydrant at Pheasant Hill is approximately 2.5 miles.

21-8 I received an email on November 25th that was dated November 22nd from RJ Moore. I then went that day and talked with the North Liberty building inspector Tom Palmer. We discussed square footage needed for the convention center depending on its use. If only standing space is figured in you will need 7 square feet per person, however if the space is to be used for seating with tables you need 15 square feet per person. Using the maximum capacity stated by the Iowa City Gazette of 384 people, the total square footage needed will be 5,760 square feet. This calculation was done using North Liberty City standards. These numbers are important in figuring the water flow needed to this site in case of a fire

On December 2nd I talked to John Castle, the head of Corps. Of Engineering. John provided a copy of the layout of the campgrounds and showed me a picture of the proposed Convention Center. It appeared to be a heavy timber construction, however did not provide the height dimensions needed to figure in water flow needed.

21-8 December 3rd I met with RJ Moore, Rick Dvorak, and Ruben Arsate. I brought several questions concerning what Johnson County had for building codes on property regulations. Johnson

NORTH LIBERTY FIRE DEPARTMENT

Chief David A. Hubler

FIRE/RESCUE/HAZMAT

25 West Cherry Street
North Liberty, Iowa 52317

Phone: (319) 626-5717

Fax: (319) 626-3288

E-Mail: dhubler@cl.north-liberty.la.us

County uses United Building Codes. According to Ruben this will be classified as an A-3 structure under the UBC. This is for an occupant load of less than 300 with an assembly room for educational purposes but without a legitimate stage, and not classed as group B or E occupancies. A-3 structures must be of Type I construction. Type I construction must consist of steel, iron, concrete, or masonry. Walls and permanent partitions shall be of noncombustible fire-resistant construction. Permanent nonbearing partitions of one-hour or two-hour fire-resistive construction and not part of a shaft enclosure may have fire-retardant treated wood. This type of structure with a floor area that exceeds 1500 square foot will require an automatic sprinkler system.

2-1-7
My feelings are that Scales Bend Road is one of the worst roads we have in our fire district. It is narrow and winding, which makes it difficult to drive even in good road conditions. As this area is to be used year round the threat of wet, icy, or snowy driving conditions it is a concern. The lane leading into the camp is to be the existing road of gravel measuring 18 feet across which is not wide enough for tanker shuttle, which will have to be established. Some of the trucks will carry up to 3000 gallons of water plus the additional truck weight of approximately 48,000 pounds. In the case of an emergency these trucks will be meeting and passing each other on this road with a soft shoulder creating a larger hazard for rescue personnel. I feel that we need a road width of at least 22-24 feet. Due to the length of this lane there is a need for a turn around area as set by the county supervisor's a few years back. We will also need a cul-de-sac area at each end of the convention center due to pumper and portatank placement needs. In the case of a fire this is very important to staging. We will be sending tanker trucks in dropping their water load into the porta-tanks and then turning the trucks around in order to send them back out for more water. Another concern is the ground elevation, as based on the map. There is a drop of 50 feet from the gate to the convention center and depending on weather conditions this could also cause problems.

2-1-1
figure the water flow that will be needed in the case of a fire you need to factor in the total dimensions of the building. These exact numbers have not been provided for me so I have done the best I could with approximate calculations. From the drawing I have factored 107 x 70 or 7490 square feet. From the drawing shown to me by John Castle I have approximated the overall height of the structure to be 30 feet. These numbers calculated together give you an area of 224,700 cubic feet. In order to best determine the water needs in case of a fire divide this number by 100 equaling 2,247 gallons of water per minute needed for a time span of 4 hours. In order to achieve this amount we will need at least three (3) pumpers or a pumper and a Quint (ladder Truck) to provide that much water flow. Keep in mind that if the convention center or any of the cabins were to catch fire the risk of it spreading to the surrounding wooded areas is great; this unfortunately would stretch our resources even further. We carry 1000 gallon on 112 and 113, which are pumpers; the Quint holds 400 gallons, the tanker carries 1750. There would be a need to call mutual aid, which will also provide us with water as well as manpower. Available would be Swisher tanker at 2000 gallons, Oxford at 2000 gallons, Solon at 1800 gallons, West Branch at 3000 gallons, Hills 2000 gallons, Lone Tree at 2000 gallons, and Riverside at 1500 gallons. Tiffin will have a new truck available by August 2003. This would be using every tank in Johnson County to maintain water flow. Drive time back to the hydrant will be about 5 minutes. Depending on hydrant pressure it will take 4-4.5 minutes to fill these tankers, West Branch's truck will take approximately 6 minutes. Driving time back to scene, varying on each tanker and road conditions, will take approximately 6 minutes with a dumping time of 1.5-2 minutes. This needs to be a consideration, as we cannot put in a dry hydrant due to elevation factors. The lowest point on the campgrounds is 710 feet and the lake is 673-680 feet. A dry hydrant can only pull water

NORTH LIBERTY FIRE DEPARTMENT

FIRE/RESCUE/HAZMAT

25 West Cherry Street
North Liberty, Iowa 52317

Chief David A. Hubler

Phone: (319) 626-5717

Fax: (319) 626-3288

E-Mail: dhubler@cl.north-liberty.ia.us

21-11
21-12
up 25 feet and at 20 feet the effectiveness is decreased. We would also have trouble laying a 1 1/2" hose line. From the road to the cabins you are about 200 feet. One possible solution would be to widen the trails overall. Widening the trail that runs from north to south by the toilet would also be helpful in placement of a pumper or for staging of ambulances in the case of a medical emergency.

21-13
21-15
This all said I do have several questions and concerns. In the case of safety, who is going to be the regulating party over the camp site, such a sprinkler function, total capacity, and campfires during dry years when the burn ban is in effect. Is this the responsibility of the Fire Department, Johnson County Sheriff, Johnson County Building Inspectors, or the Corps.? What fines are to be set for violations? Who is responsible to get the people out of the area if they don't have their own vehicles, and if they are using busses how will this affect our ability to get our equipment in and set up? Also what type of storm shelter is going to be in place for these people and will it meet Maximum capacity needs? 21-16
21-17

20-1
The camp in itself is not a main concern to me but the convention center is. This is a commercial property that is being placed Corps. ground. Because of this there is no tax reimbursement to the City of North Liberty or Penn and Madison Townships. This I feel is unfair to the residents of the area who will be paying in tax money to help support the protection of the center. You have to look at the possible and most likely increase in traffic accidents, fire and medical coverage, water rescue and or recovery, which is not being financially supported by the center but instead our own residents. As for the Fire Department we have seen a significant increase in the number of calls over the last ten years. These numbers have increased as the population has increased but the number of calls to Corps. property has also doubled in the same time frame.

If you have any questions for me please feel free to contact me and I will be willing to help answer them the best that I can.

Summary

- 22-5 1. Scales Bend Road had load embargos and is bad to drive in good weather conditions.
21-7 2. Roads into the campgrounds are not wide enough and needs to have the tree canopy trimmed to at least 13 feet above ground.
3. Roads into the campground are too long without the proper turn around areas. These need to be in place with strict rules concerning No Parking at anytime.
21-8 4. Convention Center will have to have sprinkler system in place.
-9 5. Water needs are approximately 2,247 gallons of water per minute over a time span of four hours.
6. To effectively fight a fire we would need full mutual aid from the county and hope that no other major structure catches fire in the county at the same time.
21-10 7. Weather conditions could add to delays
21-11 8. No dry hydrant will work on the camp site
21-12 9. Tent and cabin accessibility are difficult to obtain with hose lines
21-13 10. Who will have jurisdiction over building code enforcements
21-14 11. Fire Department should be compensated for coverage of commercial property
21-15 12. Storm shelter needs to be addressed for the safety of the people

NORTH LIBERTY FIRE DEPARTMENT

Chief **David A. Hubler**

FIRE/RESCUE/HAZMAT

25 West Choy Street

North **Liberty**, Iowa 52317

Phone: (319) 626-5717

Fax: (319) 626-3288

E-Mail: **dhubler@cl.north-liberty.ia.us**

6-1-2
I would like to add on one more tanker in Johnson County **is** Kolona, which is 1500 gallons,
To figure water shuttle you use number of tankers plus total water capacity of all tankers,
Divided by driving time, which is driving to and from hydrant, **filltime**, unload, and staging
Hook up to hydrant. I figure this to be about 20 minutes in good weather conditions

Total Tankers = 9

Total Capacity = 17,550

Total **Drive** Time Pre united 20 minutes

17,550 divided by 20 = 877.5 gallons of water pre minute

This means that they would have to be all the tankers their and in the shuttle **at** the same time
and as you can see they are from across the hole county.

This means that they would have to provide water storage of 1,370 **gallons** pre minute and
maintain this for **4** hours our 328,680 either through storage our pumps our both.

8-12
This building should be with sprinkler system; this means that they would have to have water
storage for this system. I do not have the number of gallons this would be **but** this would **be** on
top of the water that we would need.

ATTACHMENT K

Memo from Johnson County Sheriff, Re: Environmental Assessment



ROBERT CARPENTER • **SHERIFF** OF JOHNSON **COUNTY**

POST OFFICE BOX 2540 • IOWA CITY, IOWA 52244

Routine Business (319) 356-6020
Civil Process (319) 356.6030
Jail (319) 358-6025
Fax (319) 366-6017

December 9, 2002

TO: Rick Dvorak

FROM: Sheriff Carpenter

RE: Muslim Youth Camp Proposal

2/1-19

I do not think that the study that was done provided enough facts and information for me to make a good decision on the proposal for public safety's concern and that further studies need to be done.

ATTACHMENT L

Memo from Johnson County Ambulance Service, Re: Environmental Assessment

JOHNSON COUNTY EMERGENCY AMBULANCE SERVICE

808 S. Dubuque Street ■ Iowa City, IA 52240

Business (319) 356-6013

FAX (319) 351-0695

TO: RJ MOORE
PROM: SIBVR SPENLER
SUBJECT: ASSESSMENT OF THE MYCA LEASE
DATE: 12/09/02

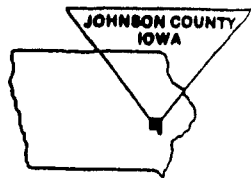
1-20 { In reviewing the assessment, I do not find where this camp will have a significant impact on Johnson County Ambulance Service. I was pleased to see the councilors will have training in CPR and in **First Aid**. The North Liberty First Responders are well trained to provide basic emergency medical care and are equipped with Automated External Defibrillators (AED's). They would be the first to arrive to assist with any medical emergencies at the camp. The Corps of Engineers would also respond and they too are equipped with AED's. During the day, we would most likely be responding from Coralville and could be on the scene to provide advanced care within 11 minutes on the average. From 11:00PM to 07:00AM we would respond from Iowa City which may add 4 minutes to our response time. I do not believe the location of the camp would pose a problem for the ambulance service. Given the age and number of campers at the camp, I do not perceive a significant increase in requests for our services. Steve Spenler

RECEIVED
JOHNSON COUNTY
PLANNING & ZONING

DEC - 9 2002

ATTACHMENT M

Memo from Johnson County Emergency Management
Re: Environmental Assessment



JOHNSON COUNTY EMERGENCY MANAGEMENT
Thomas L. Hansen
Emergency Management Coordinator



December 3, 2002

Rick Dvorak, Administrator
Johnson County Planning and Zoning
913 South Dubuque St.
rdvorak@co.johnson.ia.us

My office has been asked by Mr. Dvorak to review and comment on the Environmental Assessment of the MYCA lease proposal between the Rock Island District Corps of Engineers and the Muslim Youth Camps of America (MYCA).

The document is quite lengthy and detailed, however, there are a few items that my office feels need to be clarified by the Corps of Engineers and the County of Johnson, Iowa.

Throughout the document the phrase "No Significant Impact" is utilized, our experience makes us feel that the only way there will be "No Significant Impact" is to have the property/area stay as it is. Activity always has an impact and this impact can be significant.

From notes we will try to exhibit our thoughts, you must remember that we are an unbiased entity responsible for the planning and coordination of activities in case of disaster.

My office has some observations and these deal with; page **52**, section 5.4.9, section 5.4.10. Also included are; page 61, table 10-1, numbers 1, 9, 12, and 13.

- 21-6
- 21-25
- 21-2
1. Drowning, the area is conducive to water sports and other activities, will there be enough people on site trained to respond in a timely manner for this or other type of water emergencies? The responsibility for rescue or recovery will be with the Johnson County Sheriff Department and the North Liberty Fire Department. This is an initial response, usually with the time needed for recovery or rescue this response could expand to four times the amount of service organizations utilized in the initial response. **All** drowning and/or rescues dealing with water are staff intensive and consequently cost intensive.
 2. Winter Use, Fire can always be a problem, are the cabins/lodges sprinklered, have smoke detectors, have extinguishers? Some type of alarm system directly to an alerting system. Along with these devices are there trained personnel on scene to insure proper operation of these life safety devices? Will there be a buffer zone cleared of brush and trees according to life safety codes? Will the MYCA contract for fire protection? Will there be hazardous materials on scene and if so will there be trained personnel to handle these products?
 3. Tornadoes, storms are usual in this area of the United States and one of the most fearsome is the tornado although many have witnessed the devastation Straight Line **Winds** can do. Will the area have some type of device to alert to dangerous conditions? A Weather Siren is one solution, another is NOAA weather radios. **Most of all a plan must be devised to protect all in the area.** Some type of **storm** shelter would be highly recommended, FEMA has programs directly aimed at storm shelter construction. What is the situation with the roadway and its ability to accept the large traffic of Fire,
- 21-26
- 21-2

2/1-6

Sheriff, and Ambulance if there is a situation at the MYCA. This concern knows no season, will the road accept the immediate need in winter with snow and summer with excessive heat? Will the evacuation, rescue, and search activities associated with a tornado type of incident totally overwhelm the allocated services available?

2/1-6

Flood, the flooding in the area will be a concern for Johnson County Emergency Services and responders, will the evacuation of this concentration of people be too much of a burden for the allocated services available? This type of flooding will not be limited to the camp area it will be wide spread throughout Johnson County, stressing all available resources

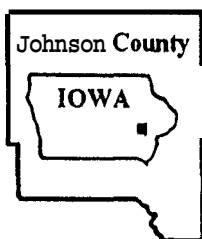
Please address any questions to our office

Tom Hansen

Thomas L. Hansen
Coordinator
Johnson County Emergency Management

ATTACHMENT N

Memo from Johnson County Public Health, Re: Environmental Assessment



JOHNSON COUNTY PUBLIC HEALTH

Ralph Wilmoth, M.P.H., M.P.A.
Director

December 4, 2002

Rick Dvorak, Administrator
Johnson County Planning & Zoning Department
913 South Dubuque Street, Suite 204
Iowa City, Iowa 52240

Dear Rick:

Johnson County Public Health (JCPH) staff have reviewed the U.S. Corps of Engineers Environmental Assessment of the proposed lease by Muslim Youth Camps of America (MYCA) at Coralville Lake, Johnson County.

13-22 [The proposed plan call for Iowa Department of Natural Resources permitted water wells and wastewater treatment systems. In the event that the proposed plan changes necessitating the installation or use of private water wells or private onsite wastewater systems, the Johnson County Board of Health regulations governing these facilities would need to be met. If abandoned wells are located on the site, they must be properly plugged in conformance with Johnson County Board of Health Regulation Governing Nonpublic Water Supply Wells 49.15(1).
21-23

21-22 [MYCA food service facilities must meet the requirements of the Iowa Food Code. Plans must be submitted to JCPH for review and approval prior to construction, remodel, or use of food service facilities. Johnson County Public Health has been delegated regulatory authority by the Iowa Department of Inspections & Appeals to enforce this code.

21-24 [Although the proposed plan does not reference swimming pool or spa facilities, if these facilities are planned in the future, JCPH should be contacted as the delegated regulatory authority by the Iowa Department of Public Health for the Swimming Pool & Spa Rules.

If additional information is needed, please inform me.

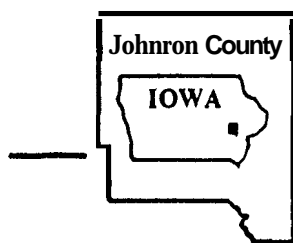
Sincerely,

Ralph Wilmoth, M.P.H., M.P.A.
Director

copy: Andy Chappell, Assistant Johnson County Attorney

ATTACHMENT O

Memo from Board of Supervisors Budget Coordinator
Re: Environmental Assessment



Jeffrey Horne

BUDGET COORDINATOR

Date: December 18, 2002

To: RJ Moore – Assistant Administrator Johnson County Planning & Zoning

Fr: Jeffrey Horne – Budget Coordinator

RE: Budget impact of proposed Muslim Youth Camp of America (MYCA) site

In response to your request, the following are some budgetary issues and impacts to consider in relation to the proposed MYCA campsite:

- I) While it is difficult to know exactly what the costs would be, the following are county services, which would be impacted by such a site on an ongoing basis.
- 21-22
- A) Sheriff
 - B) Ambulance
 - C) Secondary Roads (To maintain the road coming up to the camp. See Part IV)
- II) Johnson County's primary revenue source is property tax. Over half of county revenues are accounted for in this way. The remainder is primarily intergovernmental from the state and federal governments. The county's largest employer and landowner (The University of Iowa) pays no property tax. The county also receives no property tax from the Army Corps of Engineers. We do receive a small payment in lieu of taxes (PILT) from them each year.
- III) The county has experienced difficult financial times recently due to the drop off in interest rates and the corresponding loss of revenue and an ever expanding use of tax increment financing (TIF) by cities. TIF areas have increased 12% in value over the last year while the overall value of property increased just over 3%. Some of the increase in value in the TIF areas can be attributed to value created by the TIF, but some of it is normal increases in valuation. This inhibits the ability of the county to meet the service demands caused by growth. The county is near the \$3.50 per \$1,000 of taxable value cap in its general fund and has limited means to create any new revenue streams. A local options sales tax would have to be agreed upon by the cities and county and would then have to be passed by referendum.

IV)

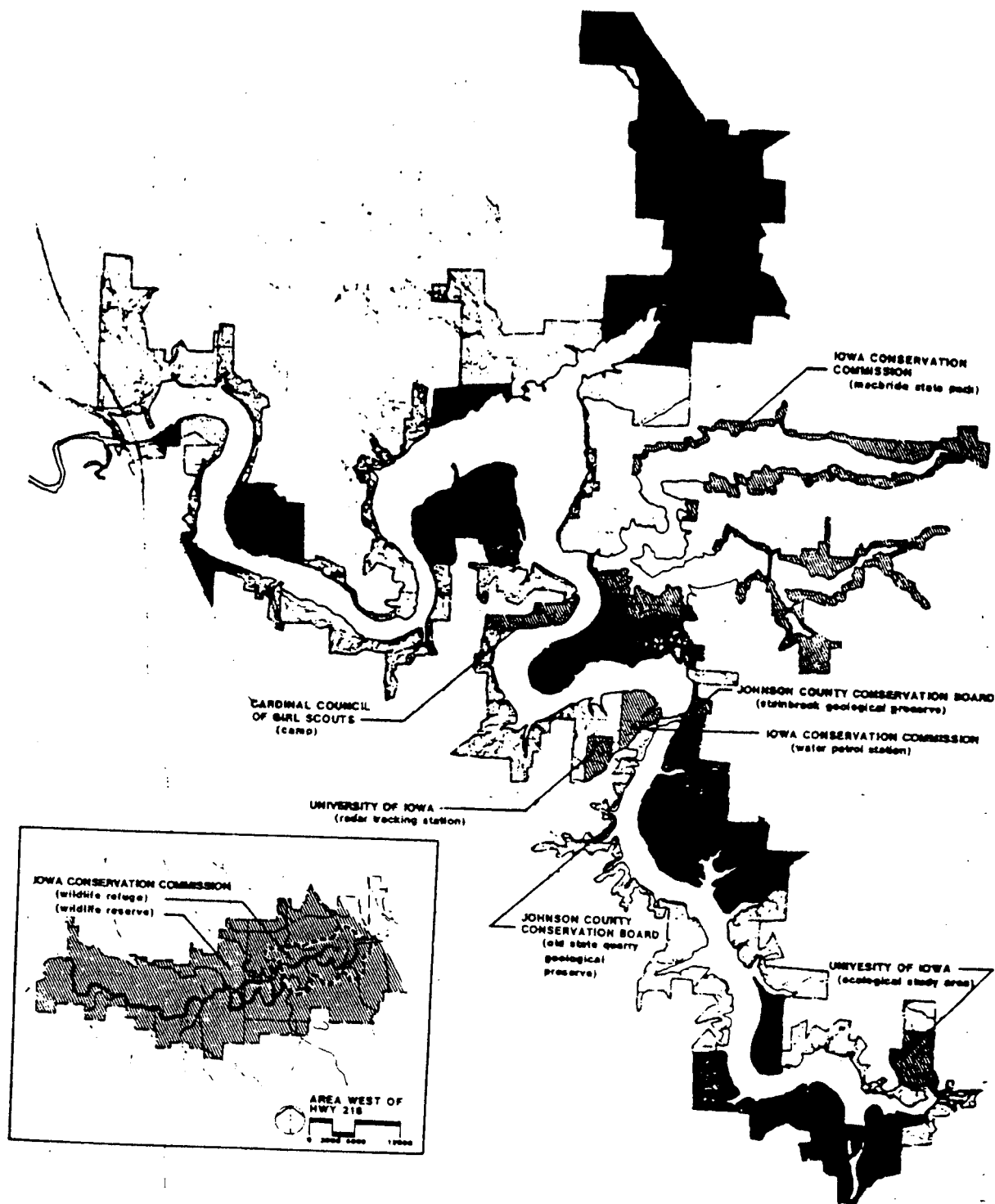
22-18

The increase in traffic would necessitate upgrading Scales Bend Road from its current state as a chip sealed road to concrete pavement. Estimates from the Secondary Roads Department to upgrade the road are \$1.2 million to pave the road from the Cemetery to the camp site and \$1.9 million to pave the road from the cemetery to the Jolly Roger Campground at the end of the road.

These are some major things that should be considered from a county budget standpoint. **If** you have any further questions, please feel free to ask. **Thank** you.

ATTACHMENT P

US Army Corps of Engineers, Rock Island District, Master Plan, Figure 10, page 67



LEGEND





- LAND ZONES**
-  reserve forest land
 -  recreation-low density use
 -  recreation-intensive use
 -  project operations

figure 10

MANAGEMENT ZONES



ATTACHMENT Q

US Army Corps of Engineers, Rock Island District, Master Plan, Page 65

VIII. PHYSICAL PLAN OF DEVELOPMENT

The development plan sets a framework for the orderly management of all lands in the Coralville Lake project area. In the planning process, future user needs were projected collaterally with the determination of land capacity to accomodate development. Project lands were then assigned a level of use to obtain the optimum balance between sustained use and resource preservation and enhancement. The user needs/resource capacity forecast from 1975 through 1990 are shown on Table 9.

A. Management Zones

Zoning classifications have been applied to all lands above the conservation pool, elevation 680 mean sea level. A more detailed zoning along the shoreline will be done in the future with the completion of Appendix F, Lakeshore Management Plan. Lakeshore zoning will be more detailed in nature than the more generalized land zoning classifications where there is an overlap in the zoning systems. The land zoning classifications, shown in Figure 10, are as follows:

Project Operations are those lands allocated for the operation of the project, i.e., the dam, spillway, administration areas, maintenance, etc. (60 acres)

Operations: Recreation/Intensive Use lands are those allocated for developments as public use areas for intensive recreational activities, including areas for concession and quasi-public development. (3,865 acres)

Operations: Recreation/Low Density Use areas are open spaces between intensive recreation developments or between intensive recreation development and other use. Low density recreational uses such as hiking, trails, primitive camping and ecological workshops are acceptable in this zone. (554 acres)

ATTACHMENT R

Appendix F , Master Pian, US Army Corps of Engineers, Rock Island District

Appendix F to the Master Plan

LAKESHORE MANAGEMENT PLAN



CORALVILLE LAKE



**US Army Corps
of Engineers**

Rock Island District

2

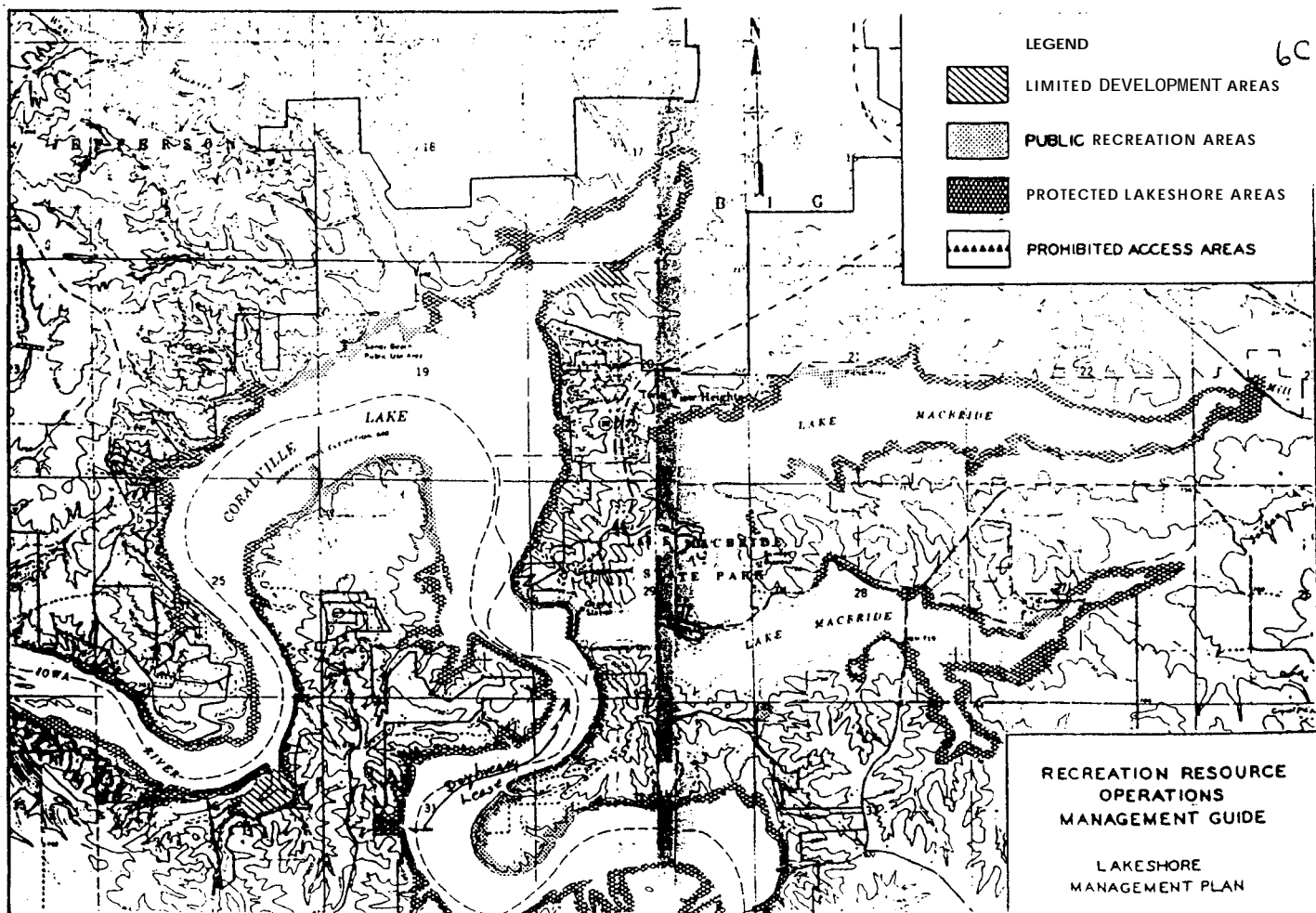
61

Exhibit 4

Land Use Maps

Land Use Definitions

- Limited Development - Private development allowed limited by
by Lakeshore Management Regulation.
- Public Recreation - No private development. Public recreation
development only.
- Protected Lakeshore - No private or public development.
Environmental area.
- Prohibited Access - No public access allowed. Safety or security
requirements demand access by designated
personnel only.



ATTACHMENT S

Resource Inventory, Master Plan, US Army Corps of Engineers, Rock Island District

RESOURCE INVENTORY

1/1/95

12/8/

SPECIAL COMPARTMENT CONSIDERATIONS

COMPARTMENT NAME AND/OR NUMBER: Daybreak

BRIEF DESCRIPTION: Mostly upland mixed hardwood forest habitat. **The soils of Daybreak** compartment have **been designated** forest soils in the Soil Survey of Johnson County; however, the vegetation found in **daybreak S-02 & 03** suggest a highly degraded prairie.

NO. OF SEGMENTS: 52

COUNTY: Johnson

DISTURBANCE: Compartment contains the Mehaffey Bridge maintenance complex and **the Camp Daybreak Girl Scout Camp.**

AERIAL PHOTOS NUMBER: 425, 427 and 811

ACREAGE: 564

OUTSIDE AGENCY INVOLVEMENT: Girl Scouts of America

WILDLIFE AND FISH RESOURCE: On numerous occasions Bald Eagles Osprey, and Red-tailed **Hawks** have been seen perched in **the** mature hardwood trees along the shoreline of the Daybreak compartment. Neotropical migrants such as the Cerulean Warblers, Acadian Flycatchers, Ovenbirds, Red-eyed Vireos and a Veery **were** observed during the **1994** breeding/nesting season.

CULTURAL RESOURCES:

MANAGEMENT OBJECTIVES AND SPECIAL PROCEDURES FOR IMPLEMENTATION OF PRESCRIPTIONS: The mature oak-hickory forest **will** be managed to increase the quality and rate of growth of the desirable canopy **trees.** 70 acres of the Daybreak Compartment underwent a timber stand improvement during the late winter/early spring **months** of 1990. Daybreak **S-02 & 03** will continue to be managed as **tallgrass** prairie habitat. Prescribed burns have been conducted on **3** occasions, **and** brush removal **was** undertaken during the fall of **1993.**

ACCESS: Most areas are only capable of being **reached** from private property. **Daybreak S-02 & 03** are accessible from the Cumberland Ridge Subdivision. The owners of Sherwood Forest to the south of Camp Daybreak have granted the Corps permission to **walk** across their property to reach public land.

04/01/95

Coralville
Natural Resource Inventory System
Compartment Report

2/17/90

Physical Information for Compartment: daybrea

Compartment	Segment	Land Cat	Map#	Mgmt Use	Habitat Type	Acreage	Geomorph Type	Soil
daybrea	01	RF	811.00	C2	DF	13.0	U	163E
daybrea	02	RF	811.00	C1	GR	13.0	U	163E
daybrea	03	RF	811.00	C1	PE	1.0	U	16302
daybrea	04	RF	811.00	C2	OF	2.0	U	163G
daybrea	05	RF	811.00	C2	DF	11.0	U	163C
daybrea	06	RF	811.00	C2	OF	5.0	U	163C
daybrea	07	LR	811.00	C2	DF	9.0	U	1630
daybrea	08	LR	811.00	C2	OF	20.0	U	163C
daybrea	09	LR	811.00	C2	DF	21.0	U	163F
daybrea	10	LR	811.00	C2	DF	4.0	U	163C
daybrea	11	LR	811.00	C2	DF	18.0	U	163G
- daybrea	12	RF	811.00	C2	DF	29.0	U	1636
daybrea	13	RF	811.00	C2	DF	20.0	U	163G
daybrea	14	RF	811.00	C1	OF	32.0	B	163E2
daybrea	15	RF	811.00	C2	DF	8.0	U	1630
daybrea	16	LR	425.00	C2	DF	4.5	U	16302
daybrea	17	LR	425.00	C2	DF	7.0	U	1638
daybrea	18	LR	425.00	T5	DF	15.0	U	1630
daybrea	19	LR	425.00	T5	DF	9.0	U	729B
daybrea	20	LR	425.00	C1	VE	3.0	B	7293
daybrea	21	LR	425.00	C2	DF	3.0	U	729B
Daybrea	22	LR	425.00	C2	OF	25.0	U	16302
daybrsa	23	LR	425.00	C2	OF	3.5	U	163E2
daybrea	24	LR	425.00	C2	OF	14.0	U	163E2
daybrea	25	LR	425.00	C2	DF	6.0	U	163E2
daybrea	26	LR	425.00	C2	DF	11.5	U	163E2
daybrea	27	LR	425.00	C2	DF	11.0	U	163E2
daybrea	28	LR	425.00	C2	DF	13.0	U	163F?
daybrea	23	LR	427.00	C2	DF	4.0	U	163G
daybrea	30	LR	427.00	C2	DF	13.0	U	1636
daybrea	31	RF	427.00	C2	DF	6.0	U	163G
daybrea	32	LR	427.00	C3	MA	4.0	U	163G
Daybrea	33	LR	427.30	C1	FB	21.0	6	1316
daybrea	34	LR	427.00	T5	MA	1.0	U	163E2
daybrea	35	LR	427.00	C2	DF	8.0	U	1635
daytrea	36	LR	427.00	C2	DF	9.0	U	163C2
daytrea	37	LR	427.00	C2	DF	37.0	U	163C2
daybrea	38	LR	427.00	C2	DF	19.0	U	163G
daybrea	39	LR	427.00	C2	DF	7.0	U	163G
daybrea	40	LR	427.03	C2	DF	21.0	U	1316
Daybre	41	LR	427.00	C2	ER	13.0	U	163C
daybrea	42	LR	427.03	C1	SA	7.0	A	163C
daybrea	43	LR	427.00	C2	DF	3.0	U	163C
daybrea	44	LR	427.00	C2	DF	4.0	U	163G
daybrea	45	LR	427.00	C1	DF	15.0	U	163G
davbrea	46	LR	427.00	C2	DF	4.0	U	16302

Total Acreage 540.5

Physical Information For Compartment: daybrea

Compartment	Segment	Land Cat	Map#	Mgmt Use	Habitat Type	Acreage	Geomorph Type	Soil
daybrea	47	LR	427.00	C1	SA	13.0	U	163E2
daybrea	40	LR	427.00	C2	DF	3.0	U	1316
daybrea	49	LR	427.00	C2	DF	3.0	U	163E
daybrea	50	LR	427.00	C1	SA	10.0	U	16302
daybrea	51	LR	425.00	C2	GR	3.0	U	163C
daybrea	52	LR	425.00	C2	BR	6.0	U	163E2

Total Acreage 565.5

The following codes and descriptions are used in processing the NRIS reports:

LAND ALLOCATION CATEGORY

These categories can be found in the project master plan:

CODE	DESCRIPTION
PO	Project Operations
HR	High Density Recreation
LR	Low Density Recreation
WM	Wildlife Management
RF	Reserve Forestland
NA	Natural Area

For land areas that do not fit in any of the above categories, the symbol "UC" is used to designate "unclassified".

MANAGEMENT USE DESIGNATION

This designation consists of two parts. The first is a letter code which designates the agency that manages the segment. The second is a number code that designates the short range management goals.

The following agency codes designate responsibility of the management of the segment:

CODE	DESCRIPTION
C	Full management of the segment retained by the Corps.
F	Management of fish and wildlife resources leased to the U.S. Fish and Wildlife Service, remaining management retained by Corps.
S	Management of fish and wildlife resources leased to the states thru the US Fish and Wildlife Service, remaining management of the segment retained by the Corps.
U	Management of the segment leased to a city for a special use. The Corps would insure that the leasee is following the requirement of the lease.
T	Management of the segment leased to a state for a special use. The Corps would insure that the leasee is following the requirements of the lease.

- O Management of the segment leased to a county for a special use. The Corps would insure that the leasee is following the requirements of the lease.
- B Management of the segment leased to a private business. The businessman may be a small concessionsire or a major corporation. The Corps would insure that the leasee is following the requirements of the lease.
- P Management of the segment leased to a private individual. The Corps would insure that the leasee is following the requirements of the lease.

The short range management goals are coded as follows:

CODE	DESCRIPTIONS
1	Wildlife Management. Produce and maintain habitat for game and nongame wildlife.
2	Forest Management. Maintain future forest cover in a healthy productive condition to meet project goals.
3	Intensive Recreation. Maintain intensively use? recreation area.
4	Low Density Recreation. Area used for low impact recreation such as hiking.
5	Operations. Areas used to conduct operation of the project.

HABITAT TYPE

The habitat types which best describe the vegetative habitat of the segments are as follows:

CODE	TYPE	DESCRIPTION
PR	Prairie	Grasslands of native grasses and forbs.

05/01/89

CR	Grassland	Grasslands where introduced prairie grasses may be present, but do not dominate the segment.
AG	Cultivated Ground	Ground on which crops such as corn, soybeans, etc., are cultivated by farmers. Additionally ground which is cultivated and seeded to millet, clover, corn, etc., to provide food for wildlife.
PL	Forest Plantation	Forest communities where trees have been hand planted in rows.
DE	Deepwater	Environment where surface water is permanent and often deep, so that water, rather than air, is the principal medium within which the dominant organisms live, whether or not they are attached to the substrate.
BR	Brush	A community of plants, dominated by brush.
SA	Savanna	Grasslands or fields with scattered trees in groups or singly. The trees do not form a closed canopy over the dominating grasslands.
MA	Man Dominated	Areas where man has planted and maintains the vegetation such as campgrounds.

FL	Forbs/Broadleaf of herbaceous ground covr.	Fields or meadow of herbaceous plants other than crops or grass.
WE	Wetlands	Wetlands are lands transitional between terrestrial and aquatic systems where the water table is usually at or near the surface or the land is covered by shallow water. For purposes of this classifica- tion wetlands must have one or more of the following three attributes: (1) at least periodically, the land supports predominantly hydro- phytes, (2) the substrate is predom- inately undrained hydric soil, and (3) the substrate is nonsoil and is saturated with water or covered by shal- low water at some time during the growing season of each year.
DF	Deciduous Forest	A forest community in which the trees and shrubs drop their leaves in the fall and grow new leaves in the spring. These species are commonly referred to as the hardwoods.
CF	Coniferous Forest	A forest community that is character- ized by coniferous or cone-bearing tree species. These species of trees are commonly referred to

as evergreens and softwoods. These woods may very well be harder in composition than the deciduous species or hardwoods.

GEOMORPHIC TYPE

The compartment segments are also coded using these geomorphic characteristics:

CODE	CATEGORY
U	Upland
B	Bottomland
A	Borrow area
H	Highly eroded

Bottomland is land that is periodically inundated. All **other** land not otherwise coded as bottomland, borrow area, or highly eroded is upland.

SOIL TYPE

The alpha-numeric codes used in the Johnson County Soil Survey book were used to describe soil types. The following codes and descriptions were used in the NRIS:

CODE	DESCRIPTION	SLOPE(Percent)
110B	Lamont fine sandy loam	2 - 5
110E	Lamont fine sandy loam	9 - 18
11B	Colo-Ely complex	2 - 5
1220	Nodaway silt loam, channeled	0 - 2
1291	Atterberry silt loam, benches	0 - 2
1315	Perks - Spillville complex	0 - 2
1316	Flavaquents, ponded	
1485	Spillville loam, channeled	0 - 2
160	Walford silt loam	0 - 1
163R	Fayette silt loam	2 - 5
163C	Fayette silt loam	5 - 9
163C2	Fayette silt loam	5 - 9
		(Moderately eroded)
163D	Fayette silt loam	9 - 14
163D2	Fayette silt loam	9 - 14
		(Moderately eroded)
163D3	Fayette silty clay loam	9 - 14
		(Severely eroded)

05/01/89

A. Segment numbers are **arbitrarily assigned** to the various **segments (stands)** and **entered** on the **NRIS** inventory sheet, **stored in the NRIS** and drawn on the **acetate** overlay kept in the compartment file and **indexed** to a set of **segment** prescriptions.

B. The segment deroriprtion (**NRIS data** sheet) contains the following information:

1. Segment Number
2. Computer Abbreviated **Compartment** Name
3. **Land** Alloaetion Category Code
4. **Aerial** Photographic Number (1984 **Infra-Red**) containing segment.
6. Management Use **Delegation** Code
6. Habitat Type Code
7. Acres Contained in Segment
8. Geomorphic Type Code
9. Soil Type Code (Johnson County Soil **Survey**)
10. Slope Peraent
11. Aspeot Code
12. Elevation in Feet NGVD: Lower & Upper
13. Square Feet of **Basal Area**
14. Age of a Typical Dominant **Species** Indlvduel
15. **Growth** .Number of annual rings in outer inch of growth
16. Number of Den Trees
17. **Size Class** Code
18. Average **Understory** Height
19. Observed Understory Species 1, 2, 3
20. Dominant Species Observed 1, 2, 3
21. Notable Other **Species Observed** 1, 2, 3, 4, 6
22. Treatment Prescription Code Plus Date Planned & Completed



ATTACHMENT T

Johnson County Land Use Plan, Page 13: Environmental Development Policies

development is not scattered. Some of the policies in this plan are intended to guide development to areas where the County can provide services to residents in a cost-effective manner.

As development encroaches into rural areas, there is often an expectation that urban levels of service are needed to support the residential and other uses. For example, higher levels of road maintenance and emergency services may be needed to provide for health and safety. Rural services are not intended to compete with urban services, and, in fact, could cause uncoordinated growth just beyond municipal boundaries if they did. If development is scattered throughout the County, it is difficult to deliver timely and efficiently services. The net effect is a higher cost to the County which affects the taxes of all residents. The county will provide a rural level of services in rural areas.

TYPES OF LAND USE POLICIES

Land use policies are categorized as general and specific. General land use policies consist of criteria that apply to all land use proposals, and specific ones apply to the designated geographical land use classification in the County: agricultural/rural, North Corridor, unincorporated villages, fringe areas, and cities.

GENERAL DEVELOPMENT POLICIES

General Development Policies fall into seven (7) categories; Environmental, Agricultural/Rural, Minimize Land Use Conflicts, Transportation, Residential, Economic Development, and Parks and Open Space. In making land use decisions in Johnson County, the following General Development Policies should be followed:

1. ENVIRONMENTAL

- 1.1 Protect the environmental quality and natural resources of the County such as woodlands and forested areas by reducing forest fragmentation

and destruction of natural habitat for wildlife and plants. (Please see Land Cover Map, Page 1M)

- 1.2 Preserve significant features, such as prairie remnants, wetlands, steep slopes as defined by a Sensitive Areas Ordinance, and prime agricultural land. (Please see Johnson County Soils Map, Page 2M)
- 1.3 Protect drainage areas, creek beds, and other highly erosive lands.
- 1.4 Protect Johnson County water quality.
- 1.5 Protect archaeological sites, artifacts, and themes **such** as burial mounds.
- 1.6 **Preserve** and protect historically or architecturally significant resources.

2. AGRICULTURAL

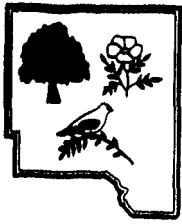
- 2.1 Preserve agricultural land.
- 2.2 Protect farming activities from residential encroachment.
- 2.3 Preserve the availability of agricultural land in Johnson County.
- 2.4 Support the rural lifestyle and the quality of life associated with agriculture presently available in Johnson County.
- 2.5 Discourage non-farm development on prime agricultural land with a Corn Suitability Rating (CSR) of 65 or greater. (Please see Johnson County CSR Map, Page 3M)

3. MINIMIZE CONFLICT

- 3.1 Recognize existing zoning patterns and minimize disruptions to existing uses.
- 3.2 Ensure adequate infrastructure and quality public services are available at a level appropriate to the land use.
- 3.3 Evaluate rezoning proposals to ensure additional development does not occur at a density that requires urban services.
- 3.4 Applications for rezoning which would make an additional demand on or require enhancement of rural County infrastructure should not be approved unless the developer agrees to bear the cost of improvement.

ATTACHMENT U

Memo from Johnson County Conservation Board, Re: Environmental Assessment



JOHNSON COUNTY CONSERVATION BOARD

Harry L. Graves, Director
2048 Highway 6 NW, Oxford, IA 52322-9211
Phone - 319/645-2315, Fax - 319/645-2204
E-mail - conservation@co.johnson.ia.us
Web - www.johnson-county.com

Board Members:
Julie Gunnels
Gerald Morgan
Loren Horton
Christine Rohret
Tom Hoff

December 4, 2002

Rick Dvorak, Administrator
Johnson County
Planning & Zoning
913 South Dubuque Street Suite 204
Iowa City, IA 52244

Re: Review and comment on
Environmental Assessment MYCA Lease

Dear ~~Rick~~:

Per your request, I have reviewed the Environmental Assessment document prepared by Zambrana Engineering, Inc. of the Proposed Lease at Coralville Lake. I have also walked over the proposed site to better familiarize myself with the exact area a couple of times. My response is limited to the Terrestrial Ecology section in the Summary of Findings on Page 16 – Loss of 403 trees, displacement of biota, loss of 4.8 acres of terrestrial habitat and on this information, I offer the following:

Environmental Consequences addressed on page 40-42 of the assessment document propose habitat alteration and impacts on 4.8 acres of primarily deciduous forest to parking lots, structures, lodges, trails and beach areas as well as land that would be converted to accommodate a leach field. As a result of that activity, terrestrial biota would be displaced; mortality of less mobile fauna and habitat for foraging and nesting would be lost. A total of 403 trees are projected to be removed. The destruction of 400 trees for the construction of a parking lot is an appalling thought!

However, an examination of the site and review of the Summary of Impacts to tree Species on page 42 of the document reveal that the quality of the timber proposed for removal is of a relatively low quality. Of the 403 trees slated for removal, only 27 are of 16" diameter at breast height. The majority is pole timber that has succeeded into the site since the Girl Scout Camp Daybreak ceased operation twelve years ago. Weed tree species including hop hornbeam, honey locust and elm comprise a fair amount of the re-growth.

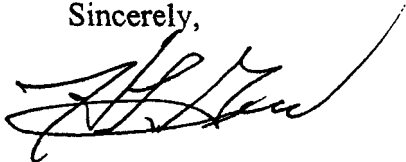
9-21
The impact on bird and mammal populations on this small site, which was previously disturbed, appears to be of minimal consequence.

When these site conditions are taken into consideration along with the fact that this area was the site of a development until recent times the proposed habitat alterations could be an opportunity to actually improve the area.

9-20
I find but one allusion to the replacement of displaced trees in the document. The removal of 403 trees, particularly, the oaks, ash, walnut, maple and hackberry trees is, in my mind, a significant loss. However, if mitigation measures requiring the replacement of every tree removed with high quality native hardwood species is included in the design, and if part of the mission of the proposed camp is the teaching of life lessons to young people on the necessity of environmental stewardship, then it seems to me, that the benefits could offset these losses in the long term.

These observations are based solely on the environmental consequences to the terrestrial ecology that I foresee in the proposed MYCA lease plan.

Sincerely,



Harry L. Graves

ATTACHMENT V

**Memo from Johnson County Secondary Road Department, Roadside Vegetation
Manager, Re: Environmental Assessment**

ASSISTANT COUNTY ENGINEER
Alan A. Miller, P.E.

ASSISTANT COUNTY ENGINEER
JinYeene M. Neumann, P.E.

ASSISTANT COUNTY ENGINEER
Rob Winstead, P.E. & L.S.

JOHNSON COUNTY ENGINEER
Michael R. Gardner, P.E.

MAINTENANCE SUPERINTENDENT
Kevin A. Hackathorn

ASSISTANT MAINTENANCE SUPERINTENDENT
Frank M. Floerchinger, Jr.

ROADSIDE VEGETATION MANAGER
Chris Henze



JOHNSON COUNTY SECONDARY ROAD DEPARTMENT

4810 MELROSE AVENUE WEST, IOWA CITY IOWA 52246

(319) 356-6046 FAX (319) 339-6133

To Whom It May Concern:

I have briefly read through the criteria used for the Environmental Assessment of the proposed MYCA Coralville Lake Lease, and felt that of the criteria, my experience would allow me to comment on five. These criteria are: soils and geology, terrestrial ecology, aquatic ecology, wetland resources, and threatened and endangered species.

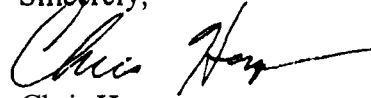
30-5 { I have concerns mostly about soils and the ability to prevent soil erosion during and after the construction process, and until permanent vegetation has been established. The slopes around the proposed disturbed area are fairly sloped and will be prone to surface erosion. If not properly controlled, this can lead to lake sedimentation/siltation and increases in water turbidity. I would suggest low maintenance prairie grasses and wildflowers in appropriate locations, as these species are an excellent erosion control and require very few chemicals. Another concern that I would have within this criteria is if the area is put into a lawn, that lawn chemicals and fertilizers be limited or appropriate products be used. This is because of the close proximity of the lake and the propensity for movement of the pesticides and fertilizers if not applied correctly. 9-19

12-7 { My concerns in the area of terrestrial ecology are fairly well addressed in the Summary of Findings. [The loss of trees, especially species native to Iowa and species used by the Indiana Bat should be minimized if possible.] [Techniques that minimize disturbance to the tree root system should be implemented during any construction with heavy equipment.] [I am also concerned about the disturbance caused by activities associated with construction being a possible location for invasive species and noxious weeds to gain a foothold in the Coralville Lake corridor. Who will be managing the property and how will it be done in respect to invasive weed and tree species?] 9-18
9-10 { Another factor to be considered in the terrestrial ecology criteria is the creation of 4.8 acres of disturbance in a relatively contiguous block of habitat. This may impact wildlife movement and dispersal patterns, as well as creating openings for detrimental species such as the brown-headed cowbird, which are a serious pest of warblers and other songbirds.

10-3 { I have no substantial concerns with the proposed lease and its effects on aquatic ecology or threatened and endangered species. Both criteria should remain mostly unaffected other than destruction of shoreline habitat. I don't think that the fishery will be negatively impacted to a major extent.

11-1 [One other criteria that is of some concern is the conversion of ~0.1 acres of wetland. While this is a relatively small amount of acreage, many of the forested, temporary wetlands are vital to the survival of many species of herpetofauna. If alternate **siting** of facilities could protect **this** wetland, or limit disturbance, it should be **encouraged**. Mitigation of wetland disturbance elsewhere **may** be a viable alternative on the lease.

Sincerely,



Chris Henze
Roadside Vegetation Manager

ATTACHMENT W

**Memo from Urban Conservationist, Natural Resources Conservation Service
Re: EnvironmentalAssessment**

Comments on Environmental Assessment of Proposed Lease at Coralville Lake

Submitted by
Wayne Petersen, Urban Conservationist, Natural Resources Conservation Service
December 2002

Background Information: After reading the Environmental Assessment, I returned to Table 3-6 "Summary of Findings" to organize my comments. I have addressed each line item, referring back to text within the Assessment as needed. In some cases, I did not have the technical expertise to speak with any authority but occasionally offered thoughts/opinions as a concerned or interested citizen. I tried to note where I was offering "professional opinions" versus "personal opinions". As a Soil and Water Conservationist, I felt most qualified to address Soils and Geology, Terrestrial Ecology, Aquatic Ecology, Wetland Resources, and Surface Water Resources. These items constitute the bulk of my comments. I also included ecological and green development background information that hopefully explains and supports the basis of many of my comments.

I mainly addressed the findings only for Alternative 1-- MYCA Lease, which was identified as the preferred alternative.

Item 1: Soils and Geology. The finding for the preferred alternative was "*localized soil erosion during construction*".

Page 40 of the Assessment states there would be "Only minor impacts to the project area soils ... Erosion of the site soils will be controlled using best management practices. No lasting impacts to the soils and geologic features of the project site are anticipated."

8-3 I'm not qualified to speak with authority on geological issues, but it seems likely that no impact to the geology of the site would occur.

8-4 I can speak to impacts to the soil resources. I did not necessarily agree with the findings regarding impacts to soils.

I feel that construction of roads, parking areas, buildings and other infrastructure will probably create "significant" erosion potentials. With high erosion potentials comes high potential for offsite delivery of sediment to Coralville Lake. The report statement that erosion will be controlled. I suspect that what was meant was "sediment will be controlled."

In most cases it is difficult to control erosion on construction sites. In most cases, sediment control practices are employed rather than erosion control practices. The difference is that erosion control means preventing the detachment, the transportation, and the off-site deposition of soil particles. Sediment control means that that soil particles moving in the erosion process will be retained on site and prevented from moving to an off-site point of deposition (which in this case would be Coralville Lake).

It may be nit picking about semantics. This may be a minor point. But I see too many silt fence installations referred to as erosion control systems and too many construction sites with inadequate erosion and sediment control plans in place. So I feel it is important to understand and discuss the difference between erosion and sediment control and to take seriously the need to exercise caution to prevent negative impacts.

8-5 While erosion potentials are high on most construction sites, erosion can be reduced and sediment delivery to offsite receiving waters can be controlled if an adequate Erosion and Sediment Control Plan is developed, implemented, and maintained throughout the construction period. The goal should be zero

discharge of sediment to off-site receiving waters. Minimizing the amount of erosion will allow sediment control practices to perform better and help achieve the objective zero discharge of sediment to off-site points of deposition.

8-5
cont.

Controlling construction site erosion usually involves practices such as:

- phased grading to minimize exposed soil
- mulching to provide protective cover on exposed soil surfaces
- temporary seedings to provide protective cover
- applying compost blankets or erosion control matting to cover exposed soil surfaces
- or others

Sediment control usually involves practices such as:

- silt fence/geo-ridges/compost socks
- sediment control basins
- vegetative buffers around perimeter of the site
- or others

This may be another minor point, but in a number of places throughout the document reference was made to the need for the applicant to acquire needed permits associated with this proposed development (401, 404, variance for wastewater treatment). It should be noted that as of March of 2003, any land disturbing activities that will impact more than one acre of land will require a NPDES permit (National Pollution Discharge Elimination System). This site will need an NPDES permit. To receive an NPDES permit from the Iowa Department of Natural Resources the applicant must certify that an adequate Pollution Prevention Plan (PPP) has been developed for the planned activity on the site. The most critical component of a PPP for a construction site is a sound erosion and sediment control plan.

8-6

30-6

The other significant concern that needs to be considered is the altering of soil profiles and compaction that occurs with land disturbing activities. Later in these comments I will talk about stormwater management and the need for "green" stormwater BMP's to mitigate the impact of impervious surfaces. Green BMP's utilize natural features of a site whenever possible to help reduce stormwater runoff. The soil profile provides tremendous potential to serve as a green stormwater infrastructure. Soil resources can serve as an infiltration system, a water storage facility, and partitioning mechanism that releases rainfall in a slow and stable manner to down-gradient receiving waters.

%

The Fayette soils that dominate this site have the capacity to infiltrate anywhere from 0.6 to 2 inches of rainfall per hour. Fayette soil should be able to store about 2 inches of rain per foot of soil profile. A four-foot profile of Fayette soils could store up to 8 inches of rainfall. A 100-year storm is about 7 inches of rain in 24 hours. Because of these potential benefits, I find it of critical importance to protect and enhance soil resources on this or any development site.

Measures that need to be taken to protect and enhance soil resources include:

- Protecting the soil profile from disturbance and compaction. Compaction is a significant and lasting negative impact. Compaction prevents infiltration and rids the soil profile of pore space needed for storing water. Design developments to fit the existing landscape to minimize grading needs and use a building envelope. Contain land disturbing activities and traffic within the envelope to keep the amount of land impacted to a minimum.
- Enhancing soil quality to increase infiltration rates (i.e. applying compost to achieve a desired level of organic matter content, which can be specified according to the desired level of rainfall to be absorbed.)
- Ensuring a healthy community of deep-rooted native vegetation is present to enhance soil quality, to maintain OM content, and to transpire water out of the soil profile into the atmosphere.

8-8

8-9

Mass grading and random traffic patterns - so typical on most construction sites - creates significant and lasting impacts to the soil resources. Therefore, I was not comfortable with terms like "localized erosion" and "minor impacts" and "no lasting impacts" when discussing soil resources.

Item 2: Terrestrial Ecology. The finding for the preferred alternative was "a loss of 403 trees, displacement of biota, loss of 4.8 acres of terrestrial habitat."

2-10 This finding was compared to reduced numbers for Alternative 2 and 3. For Alternative 4 (do nothing) a finding of "no impact" was listed. What I would like to know is whether the listed impacts for Alternative 1 were considered significant or not. I intended to feel they would not be significant and would certainly not be significant if green development techniques and restoration based land management practices were implemented on the rest of the property. I disagreed with the finding of "no impact" if nothing is done.
2-1b Doing nothing to "natural areas" creates negative ecological impacts. I will offer background information that will hopefully explain and support my comments on impacts to Terrestrial Ecology.

I have come to believe that the emerging discipline of restoration ecology, which is based on the native ecosystem model, should be the guiding light of natural resource management. While I will not take the time to explain all of what I believe restoration ecology or the native ecosystem model involves, I will say that most of the landscapes of Iowa are much different and significantly altered from the historical landscapes of the tallgrass prairie region prior to European influence and settlement. I believe that the indigenous people were active managers of their ecosystems and that the stable and sustainable prairie, savanna, woodland, and aquatic ecosystems that evolved on this landscape did so in conjunction with human influence. Therefore, to remove the human influence eliminates an ecological factor that our native ecosystems were dependant on to continue to be stable and sustainable. To remove the human influence is as unnatural as removal of the influence of bison or elk or the predator species that once kept the population of deer and other prey species in check.

2-11 [That is why I disagree with the finding listed for Alternative 4 - that "No Action" would have "no impact". It is my professional opinion that this site and much of the woodlands of Iowa are in a state of decline due to lack of human influence and active management. The primary management tool of the indigenous people was fire. A growing body of evidence is building to support the theory that much of the Iowa landscape, including wooded systems, was burned and usually burned on an annual basis. Since the time of European settlement, fire suppression has been a goal of woodland management. This has led to a significant change in the composition and function of woodlands. In my professional opinion these changes are generally detrimental.] (See the discussion of hydrologic impacts associated with the conversion of native ecosystems in the next section.)

Where modern human involvement and active management is employed today (i.e. timber stand improvement practices) the results often yield a different result than what would have been seen from fire management on the Iowa woodlands of old. There were references in the report to the archeological sites on and around this property. I must conclude that this area was richly populated and utilized areas for millennia prior to modern history. Therefore, I suspect that human influence was an important part of the maintenance of a stable and sustainable ecosystem on this site and the surrounding areas. I am attaching an article, written by Professor Thomas MacBride in 1896. In the article he describes the Iowa landscapes of "fifty to sixty years" prior - the Iowa landscapes of the 1830's and 1840's when Iowa was just starting to be settled by Europeans and the original land surveys were being conducted. He describes how the woodlands had changed by the end of the 1800's due, in his opinion, to fire suppression. The landscapes of 1896 that MacBride described sound much like those we see today. The landscapes of the 1830's sound like woodlands and savannas that are being managed with restoration ecology and the native ecosystem model.

30-5 Which brings me back to the impact of the terrestrial ecology of this site. [It is my professional opinion that development on this or almost any site could be done and the terrestrial (and aquatic) ecology can be simultaneously improved if restoration ecology is employed as the management strategy for the site and if green development principals are adhered to in the design, construction, and maintenance of infrastructure.]

I refer people to the definition of "green development" that is found on the webpage of the Rocky Mountain Institute - a sustainability think tank (see www.rmi.org). They define green development as development that adds or creates no negative environmental impacts. While this seems impossible, if not counter-intuitive at a first glance, there are a growing number of models of green development on the ground that seem to be achieving no negative impact and perhaps actually improving the ecology of a site.

32-3 [The important point, in my professional opinion, is that any environmental assessment that does **not** include restoration ecology and green development perspective is lacking important aspects. In my professional opinion these components are essential for a sound assessment. How any of the four alternatives would impact this site (including the "no action" alternative) without including **ecosystem** restoration and green development needs and **recommendations** makes me feel like more work is **needed**.]

30-5 I have only briefly walked the site and seen it only during dormancy. I did **not** get over all **106** acres, and mainly saw the area that would be directly impacted by development. I did only a mental inventory of woodland composition and the condition of the existing ecosystems. I reviewed the list of plant species identified on the site, the list of bird species observed on the site, and the lists of mammals, reptiles, and amphibians potentially occurring on the site that were in the Environmental Assessment. While I do not claim to be a restoration ecologist, I have received training and have field experience with identifying native ecosystems and assessing **conditions** where degradation is occurring and restoration is needed. As is typical of many sites considered "natural", I felt that much of this site was in need of a restoration based management plan (i.e., understory **removal**, **elimination** of invasive non-native species, fire management, and reconstruction of native plant communities).

30-5 I certainly make **no** claim to having done a **full** ecological evaluation and I commend much of the fieldwork done by the consultants preparing this **report**. I do not mean to disrespect the qualifications of the team that conducted the fieldwork and prepared the **Environmental Assessment**. & I felt there is a strong need to make recommendations for restoration **ecology** management and green development to support the selection of any of the alternatives **reviewed**.

30-5 9-24 I was not concerned by the idea that trees and habitat would be lost or biota displaced. I believe that the overall ecology of the site could be enhanced if with development - if green development and restoration-based management practices are implemented. It should be noted that employing restoration-based management would likely create a shift in plant and animals species. However, this shift would most likely be ecologically positive and restore communities more similar to the native ecosystems - the stable and sustainable systems of **old**.

Item 3: Aquatic Ecology. The finding for the preferred alternative was "*Localized mortality of aquatic biota due to beach construction, alternation, of 0.2 acre of habitat.*"

[Once again, without green development and restoration based land management I feel impacts to aquatic ecology of this area will be significant and involve much more than beach construction. In my professional opinion, stormwater management after development is the most significant long-term ecological impact of this or any development site. Very little was done to discuss or describe stormwater management. I only found the following comments on stormwater management: "Replacement of natural soils with impermeable surfaces such as roofs and pavement will likely increase total runoff from the site. However, this increased runoff may be mitigated through the installation of appropriate site detention structures to prevent any appreciable impact to Coralville Lake.]

I must spend some time on background information once more to make my comments on this item pertinent (as well as comments on impacts to surface and ground water resources - Items 6 & 7).

As the native ecosystems of the tallgrass prairie were altered one of the most significant and detrimental impacts was the change in the hydrology of our landscapes. As Professor MacBride and others have indicated, the historical landscapes of our area were able to absorb and infiltrate most of the rainfall that occurred during the growing season. The high organic matter content of our soils and the deep rooted grasses and forbs (as well as the woodland sedges that would have been a significant component of the ground cover on this site) would have held and infiltrated rainfall during the growing season and shed very little surface **runoff**. Runoff would have most likely been confined to periods of rapid snowmelt and/or rainfall on frozen ground and perhaps the rare catastrophic rainfall event that exceeded the landscape's capacity to absorb and infiltrate. But the vast majority of rainfall events would have been absorbed and infiltrated where water fell,

The hydrology of old was an infiltration-based groundwater driven system. Wetlands, streams, and other surface water bodies were fed by rain falling directly on the water body and by a constant supply of groundwater seep that had infiltrated on the uplands and moved down gradient through the soil profile to emerge as a stable and constant source of clean water.

A shift in the hydrology of our landscapes occurred with the plowing of the prairies, the draining of the wetlands, the loss of the graminoid-based ground cover of the woodlands (due to increased understory that resulted from fire suppression and the consequent shading of the forest floor). The disturbance and compaction and the creation of impervious surfaces associated with development also contributed to this hydrological shift.

Instead of an infiltration-based, ground water driven hydrology we now have a runoff driven hydrology. With almost every rainfall event, we have surface runoff that causes flashiness of flows, increased flooding, gully and streambank erosion, and the delivery of pollutants to surface water bodies.

30-5 [The aquatic ecology of this area will be impacted with every runoff event if Alternative 1 is implemented unless green development and restoration based management practices are employed. (This would also be true for the other alternatives discussed). Here is where the restoration-based management and the green development discussed in the previous item would be so critical. With the restoration / reconstruction of native ecosystems, with green building designs, and with a green stormwater management system it would be possible to absorb, hold, and infiltrate most rainfall events. It would be possible to restore an infiltration-based, groundwater-driven hydrology for this site. Without restoration based management of the terrestrial ecology, without green design of the buildings, and without a green stormwater management system, the aquatic ecology will be impacted beyond the finding of this report.]

Consider the following information on water quantities that need to be managed on this site:

- One inch of rain falling on one acre of land delivers **27,152** gallons of water.
- With an average annual precipitation of 36 inches of rainfall, an acre of land receives **~ 977,500** gallons per year.
- The 106 acres that constitutes this site potentially receives almost **104** billion gallons of water per year.
- Assume the 4.8 acres of terrestrial habitat estimated to be impacted equates to the impervious and compacted surfaces that will be created from development. These 4.8 acres will receive **~ 4.7** million gallons of water per year.
- About 55% of rainfall on impervious and compacted surfaces is shed as runoff.
- 9 Therefore, **~2.6** million gallons of runoff could be shed from the developed area on this site per year (unless provisions are designed into the development to hold, absorb, and infiltrate the majority of it.)
- 9 On the remaining 100 acres, a conservative estimate of 20% of annual precipitation would be shed. That would add another **19.5** million of gallons shed, for a total of 22 million gallons of water shed as runoff in an average year.

30-5 [Adopting a restoration based management plan and green development would reduce potential runoff by over 50% and yield the rain that falls on this site in a manner that mimics the stable and sustainable hydrology of the native ecosystems. Under this scenario, it is possible to actually improve the aquatic ecology of this site over current conditions. A restoration based management plan would be recommended for this site to restore a more stable hydrology and improve the terrestrial and aquatic ecology, even if no development were undertaken on this site (i.e. if Alternative 4 was the preferred alternative.)]

9-24
Item 4: Wetland Resources. The finding for the preferred alternative was "Conversion of ~0.1 acre wetland."

11-1 While I have not field verified the conditions of the wetland on this site I suspect they are already significantly altered/degraded (the presence of reeds canarygrass as mentioned in the report is a strong indicator of degraded wetland conditions). I would, however, reconfigure designs to avoid any land disturbing activities to the wetlands, which the report indicated would be possible to do.]

30-5

I would also suggest that the wetland areas would benefit from the restoration of an infiltration-based, groundwater-driven hydrology on this site. Increased runoff that would result from traditional development practices would negatively impact wetlands further. Surges of sediment-laden runoff would further degrade them and gully erosion might bisect the upper reaches of wetlands in ravines. The formation or aggravation of gullies would tend to draw down the water tables of ravine wetland systems.

Item 5: Threatened and Endangered species. The finding for the preferred alternative was "Selected removal of trees potentially used by bald eagle and Indiana bat, no significant impact to Federal or state listed species."

Perhaps there would be no significant impact. Perhaps there would be. Perhaps conditions might improve for threatened and endangered species, if a restoration management regime were employed.

Item 6: Surface Water Resources. The finding for the preferred alternative was "Localized siltation/sedimentation, short term increases in turbidity, requires issuance of variance for wastewater treatment setback limits from IDNR."

13-7

[Much of what was said in prior comments applies to surface water resources. I disagree with characterizing siltation and sedimentation as "localized". Any siltation or sedimentation adds negative impacts to the whole. [The water treatment plant for Iowa City and the University of Iowa is potentially affected by siltation and sedimentation on this site. It is easy to say this is a small aspect of the 3,000+ square miles of land that drains into the Iowa River above this site, and consequently creates only minor or localized impacts. But only through doing development that adds or creates no negative environmental impacts on every development site will water quality and flooding concerns be addressed.]

13-8

13-2

[With regard to the impacts from wastewater treatment, I can only offer a personal opinion. Wastewater treatment is beyond the scope of my professional responsibilities but I do have concerns about the wastewater treatment system for this site. With this site's proximity to Coralville Lake, I would want special precautions taken with regard to treating wastewater.] [Although I lack technical and professional experience, I like what I have seen with regard to using wetlands for wastewater treatment. I would encourage the use of wetlands in conjunction with a leach field be investigated. Perhaps running outflow through a wetland as a pre-treatment before discharge into a leach field would yield a more effective wastewater treatment system.]

30-5

Item 7: Ground Water Resources: The finding for the preferred alternative was "no impact"

30-2

Once again, I lack professional standing to comment much on impacts to groundwater resources. [However, my personal opinion is that restoring an infiltration-based groundwater-driven hydrology would yield a net benefit to groundwater resources.]

Under "natural conditions" it is estimated that about 10% of annual precipitation is shed as surface runoff. About 45% of rainfall is held in the root zone of the soil profile, utilized by plants, and transpired back into the atmosphere. About 45% of rainfall is absorbed and infiltrated. About half of this moves down to recharge deep aquifers. About half of the infiltrated moves as groundwater baseflows to recharge surface waters.

13-26

[The Center for Watershed Protection has data on its website (www.cwp.org) that supports the growing concerns over negative impacts to groundwater recharge from the creation of impervious surfaces. While this is a small site in a large setting, we must address environmental concerns on a site-by-site basis and ensure that no negative impacts are added or created.] [Anything that creates impervious and compacted conditions without being mitigated, in my opinion, negatively impacts hydrology and groundwater resources.]

30-2

Item 8: Floodplains. The finding for the preferred alternative was **"no impact"**.

14-2 [It appeared to me that proposed development would be above floodplain elevations, so I concur with this finding.

Item 9 & 10: Recreation & Land use. The findings for the preferred alternative was **"consistent with the Corps' objective for site, provides additional recreational resource in Coralville Lake Project area" and "Consistent with the Corps' Master Plan."**

6-20 [While I find it somewhat difficult to believe that this is the best site for development of this type within the 25,000 acres of federal lands associated with Coralville Lake, I must respect the history of the land use on the site. Whether I agree or disagree with the Corps' Master Plan or objective for this site.

Item 11: Community and Regional Growth. The finding for the preferred alternative was **"Provides 105 construction jobs and 16 permanent jobs at camp, construction cost would result in statewide increase in output, operation of camp would result in annual increase in statewide output."**

30-2 [My opinion is that if development occurs on this site it should be required (by the Corps) to be done in a way that it adds or creates no negative environmental impacts. If this were done, it would provide a model for green development and a demonstration of how low impact development can be accomplished. If this were to happen, the green model it provided could help shape future growth and development of the community and the region in a positive manner. This would provide one positive outcome for a controversial situation that could result in negative impacts to things like community cohesion, which ultimately could have a negative effect on community and regional growth.

17-1 [

22-8 [The other concern I thought should be mentioned with regard to this issue is the concern raised by the County about impacts to road systems and emergency services. While I felt there were valid points to these concerns, as usual, there is a flip side. With future development potential in the area likely to exceed capacity of infrastructure and services, it seems logical to plan for future upgrades with the maximum needs considered now. With the Corps objective of intensive use for the site stated in their Master Plan, with the historical use of the site, and with County Land Use and zoning policies not being applicable to federal land, it seems likely that the Corps could proceed with the proposed MYCA. Therefore, it seems to make sense to plan for the maximum needs now. Perhaps considering road upgrades for this area should be prioritized in the recently released five-year road plan and roadwork in other parts of the North Corridor made a lower priority.

Item 12: Community Cohesion. The finding for the preferred alternative was **"no significant impact"**.

17-1 [I found this finding to be perhaps the most surprising of all the items in Table 3-6. It is my sense that there are some significant potential impacts to community cohesion with this project. In light of the concerns expressed by the County and local residents, this item deserved more attention.

Item 13 & 14: Demographics & Displacements. The finding for the preferred alternative was **"Temporary increase in seasonal populations at local level due to attendance at camp, no significant impact" and "no displacements"**.

No comment.

Item 15: Property Values and Tax Revenues. The finding for the preferred alternative was **"no impact to property values or tax base, possible minimal increases in regional sales tax revenue."**

I can understand why neighboring residents may have concern over decreased property values but I would hope this would not be the case. If an environmentally sensitive development were to occur, if a conference center brought people to a showcase of sustainability, if cultural exchange facilitated greater understanding between people of different ethnic or religious backgrounds, if natural resources were managed under a restoration-based plan and if access was made available to the neighborhood I could envision a scenario where property values could not only be maintained but perhaps enhanced.

33-11 Issues like increased traffic or noise levels are valid concerns that should be considered and addressed with sound planning, sensitive design, and good management of the facilities and activities in a post-developed state.

Finally, I return to the historic use of the site and the objectives stated in the Corps' Management Plan that have been on record for decades, I find it hard to not respect this aspects of the debate and those who have made investments in homes in the vicinity hopefully considered the history and the future of adjacent land prior to this proposal and their investment in property.

Item 16: Public Facilities and Services: The finding for the preferred alternative was "no impact".

No comment.

Item 17: Life, Health & Safety: The finding for the preferred alternative was "no impact"

I have no basis or expertise to argue with the finding that the proposed development and the 1% increase in the areas current population would not significantly impact the ability to provide emergency services. I would like to comment on the concern over having adequate supply of water for potential fire fighting capabilities, though.

30-5 The report states that ensuring an adequate water supply for fire fighting "would be required as part of the overall design" for the site. I would suggest that the green development principals I have repeatedly referred to could and should include a cistern system to help manage impervious service runoff. A cistern system could help address non-potable water needs, which could include fire fighting. The capture and on-site storage of runoff from impervious surfaces will also reduce demand on aquifers, which should have a positive effect on groundwater resources.

Item 18: Traffic and Parking: The finding for the preferred alternative was "no significant impact."

I have no technical basis for commenting on traffic issues, I read with interest the concerns expressed by the County P&Z staff concerning traffic and road standards. I read with interest the comments from the traffic and transportation engineering firm that reviewed the Environmental Assessment. They seemed to discount the traffic and road adequacy questions raised by the county.

22-8 Having driven the road as part of my review process, I have to say I tend to agree with the County's concern over the adequacy of the road system for any significant increase in traffic. But that concern extends beyond the development of the youth camp to include future private residential development.

22-9 I would like to add a few brief comments on parking. The county expressed concern over the adequacy of parking space proposed for the site. The consultants responded to these concerns by citing alternative numbers for potential users. Bottom line is that parking needs must be accommodated on site and that parking along public roadways is not an option. It seems almost impossible to ever adequately address parking needs. Therefore an off-site parking and shuttle system would seem to be a need that should be addressed if the youth camp development moves ahead. It also appeared to me that there was potential to create additional parking capacity by utilizing environmentally sensitive parking options along the north edge of the existing old road grade.

30-5 [Parking is one of the primary generators of impervious surfaces and one of the biggest contributors to the runoff driven hydrology and pollutant delivery problems that were previously discussed. Pervious (infiltrating) parking surface options should be required if development occurs on this site to prevent surges of hydrocarbon-laced runoff into Coralville Lake. I would also reconsider the proposed parking scheme as shown in figure 3-1. I do not like the location of the parking lot to the east of the proposed Lodge, due to the proximity to the Lake and the limited land for infiltration based stormwater control and treatment before discharge into the Lake.]

23-3 In fact, I would prefer that the whole complex be moved farther up the hill and to the west to provide more buffer space between impervious surfaces and the lake. The location of the existing well could create limitations with this option. The benefit of the proposed location is that it keeps development at a low enough elevation to avoid negative impacts to the viewshed of the residential sites to the north of the property. During the growing season, leafed out tree cover would alleviate such concerns.]

13-9 [Wellhead protection measures should also be considered, which I do recall being mentioned in the Environmental Assessment.]

30-8 Finally, I would require that the traffic system within the site be infiltrating surfaces rather than impervious surfaces. Just like infiltrating parking lots, road and trails surfaces (and their sub-bases) should be designed as part of a green stormwater management system so that they infiltrate, store, and slowly release rainfall.

Item 19: Aesthetic Values. The finding for the preferred alternative was *"no significant impact, change in visual character of site as viewed from lake from natural landscape to landscape with development"*.

23-4 [I appreciate the attempt to mitigate aesthetic impacts to the viewshed by trying to site buildings appropriately and create no "significantly aesthetic impact due to the incorporation and integration of the architectural design and site development into the landscape." But I think people will find the change in what they see from the lake and perhaps from the residential site to the north to be significant. This would be especially true if restoration based management was employed on the grounds – which would create a more open woodland complex (See the attached MacBride article.)

30-6 [I think the report should state there could be significant change and then talk about how utilizing green development and restoration based land management open up the landscape will differ from the rest of the shoreline and how it can benefit terrestrial and aquatic ecology. People might find they like the open model of the restoration-based management alternative compared to the dense understory of woody growth that closes off most woodlands. People might like the view of sensitively design green buildings fit nicely into a landscape with minimal disturbance

23-5 [I think there would be significant visual changes with this development, but I don't think they would have to be negative. In fact, people boating on the Lake might find the alternative they see to be educational and aesthetically pleasing.

Item 20: Noise. The finding for the preferred option was *"..... no significant impact."*

It's hard to argue with the technical findings on noise level increases as described on pages 55-56. I just know that under certain conditions, when I'm sitting outside on a summer evening in my neighborhood with high ridges and a large tree mass, I can hear many sounds from significant distances. The scream of a startled child walking the trail to a cabin at night will likely carry a significant ways on a calm summer night or if there is a slight breeze blowing toward Cumberland Ridge.

25-10 [Therefore, I think it's only realistic to anticipate some increase in noise levels. Perhaps it would not be significant. Hopefully it would be the joyful noise of children having fun or pleasant singing around a campfire. But still I would anticipate increased noise. (Certainly this is a personal and not a professional opinion.)

Item 21: Cultural Resources. The finding for the preferred alternative was "no impact."

26-1 [I trust this finding. It sounds like this site has been well studied and documented.]

Item 22: Solid/Special Waste. The finding for the preferred alternative was "no impact."

27-1 [I trust this finding.]

Item 23: Manmade Resources. The finding for the preferred alternative was "Removal of existing structures, no significant impact."

28-1 [I concur with this finding.]

Attach MacBride article.